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DIRECTOR



Alabama Department of Environmental Management

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BOB RILEY  
GOVERNOR

September 25, 2007

NFRAP  
9-28-2007  
Ralph O. Howard Jr.

Ralph O. Howard, Jr., P.G.  
Remedial Project Manager,  
US Environmental Protection Agency, Region 4  
61 Forsyth Street SW  
Atlanta, Georgia 30303

RE: Reassessment of GAMXX-AAI Energy Inc.

Dear Mr. Howard:

In compliance with EPA's request and our CERCLA grant commitment, ADEM personnel performed a site reassessment of the GAMXX-AAI Energy Inc. property located in Theodore, Mobile County, Alabama. This site has had a variety of names but has always been an oil refinery since its origin in December 1963. The Power Unit was shut down and put into mothballs on January 28, 1988, and due to market problems, the site ceased operating in December 1990. The previous owner, Castle Alabama Holdings, LLC, abandoned the site and ceased paying property taxes. After years of being idle Hamilton Blvd, LLC bought the property. They joined ADEM's Voluntary Cleanup Program and conducted a removal of drums and small containers from the laboratory and warehouse. They have completed soil testing around the leaking Aboveground Storage Tank T-202. The site reassessment was performed at your request to ascertain whether targets or circumstances have changed significantly and, by use of the Quickscore software, to determine whether or not this site needs to proceed further in the CERCLA process.

If you have any questions concerning this reassessment, please contact Bonnie L. Temple, at 334 271-7703.

Sincerely,

G. Dave Davis, Chief  
Assessment Section  
Environmental Services Branch

GDD/blt  
Attachments



11030729



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# U.S. EPA REGION IV

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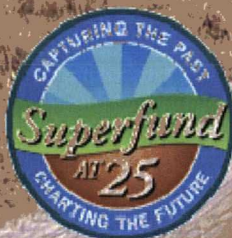
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# Site Reassessment GAMXX-AAI Energy Inc.

4000 Hamilton Boulevard  
Theodore, Mobile County, Alabama

Prepared By:  
Environmental Services Branch



**ADEM**  
Alabama Department of Environmental Management





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### List of References

<u>Reference</u>	<u>Title</u>
1	Global Positioning System (GPS)
2	Property For Sale Announcement
3	VCP Application and Letter April 18, 2006
4	Removal Assessment Report, Revision 2
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2	Trip Report, December 9, 2004
3	Photodocumentation Log, December 9, 2004
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5	Trip Report, January 16, 2007
6	ADEM Chronology for Gamxx and Seabury Station

# **Alabama Department of Environmental Management**

## **Site Reassessment GAMXX-AAI Energy Inc. Site Mobile County, Alabama**

### **1. INTRODUCTION**

A site reassessment was performed on the GAMXX-AAI Energy Inc. site located in Theodore, Mobile County, Alabama. The scope of the investigation included a site inspection and owner interview on January 11, 2007, in conjunction with the EPA Region 4 Mobile Outpost. A review of available file information, a comprehensive target survey, and Quickscore evaluation were also performed. The purpose of this investigation was to collect information concerning conditions at the site sufficient to assess the threat posed to human health and the environment and to determine the need for additional investigation under CERCLA/SARA or other action.

### **2. SITE DESCRIPTION**

#### **2.1 Location**

The site is located in Mobile County at 4000 Hamilton Boulevard, Theodore, Alabama, at latitude 30° 33' 10.25" north and longitude 88° 07' 51.03" west (Reference 1; Attachment 1). The site is situated in an industrial and distribution area with scattered commercial buildings nearby.

#### **2.2 Site Description**

The refinery facility consists of 129+/- contiguous acres, with approximately 90 acres for the main refinery site and 30 acres of woods to the west of the refinery (Ref. 2, 3). The property is relatively flat, has distinct drainage pathways, and numerous above-ground storage tanks (AST) with dikes (Figures 1-6). The refinery has 11 buildings including a laboratory, two control rooms, office and warehouse space, a machine shop, a boiler house and an instrument repair area (Ref. 4). The various structures and tanks are itemized in the Tax Return List Real and Personal Property – Mobile County, AL (Ref. 5). Prior to the Hamilton Blvd., LLC purchasing the site, the office had been vandalized and its entire entrance door frame had been removed by unknown persons (Att. 2-4). The site's three access gates have been locked and security cameras have been placed around the facility. The fence surrounding the facility has been repaired and is visually inspected daily (Att. 5). An old residence, located across Hamilton Boulevard, has been removed, and another building was being constructed at the time of the 2007 site inspection.



Prior to the site inspection of January 11, 2007, all chemicals had been removed from the laboratory (Att. 5 photographs). The various drums and containers of chemicals in the warehouse had been removed and the floor swept (Fig. 2, 3). Heavy equipment was being stored in this building. Documentation of cleanup and disposal has been submitted to the State Voluntary Cleanup Program (Ref. 6).

Friable asbestos and non-asbestos materials have been sampled and removed from the primary processing area, Power Unit and associated piping (Fig. 5; Att. 5 photographs). The transformers have been drained of PCB fluids, rinsed and staged with the capacitors awaiting removal. The monitoring wells for the 1990 Underground storage tank (UST) removal were located, and one of those wells was sampled during the Removal Assessment of March 2005.

The leakage from Tank-202 in the southeast section of the site was observed on January 11, 2007, and appeared the same as it did on December 14, 2005. A large opening has been cut in the south side of Tank-203. Its floating top has extensive deterioration. The integrity of its dike appears stable.

### **2.3 Operational History**

This site has operated under a variety of names but has always been an oil refinery since its origin in December 1963 (Ref. 7). The Power Unit was shut down and put into mothballs on January 28, 1988. Due to market problems, the site ceased operating in December 1990 (Att. 2).

The previous owner, Castle Energy Corporation, who owns Castle Alabama Holdings, LLC, abandoned the site and ceased paying Alabama property taxes (Ref. 8). After years of being idle Hamilton Blvd., LLC, an Alabama limited liability company, bought the 90-acre oil refinery in October 2005 and the remaining 30 acres in April 2006 (Ref. 3). They entered into the ADEM Voluntary Cleanup Program (VCP) on April 15, 2006 and have conducted a removal of containers in the warehouse and other cleanup activities. The VCP utilizes the Alabama Risk-Based Corrective Action (ARBCA) Preliminary Screening Values to determine cleanup standard. They have completed soil testing surrounding Tank-202 and are awaiting the results at this time (Ref. Personal Communication). They are preparing a remediation plan for Tank-202 and the surrounding soil (Ref. 9). During the 2005 and 2007 site inspection, it was observed that Tank-202 had developed a leak, had contaminated the soil inside its dike, and possibly the groundwater around the tank (Att. 4, 5). Hamilton Blvd., LLC was ordered to address this problem or face an Administrative Order and lose their ability to participate in the VCP (Ref. 10).

Since the Site Inspection (SI) was completed by ADEM in April 1999, Analytical Chemical Testing Laboratory, Inc. (ACT) conducted a Phase II of GAMXX for Castle Alabama Holdings, LLC (Ref. 11, 12). ACT's assessment report documented soil contamination by benzene, ethylbenzene, trimethylbenzene, xylenes, naphthalene, toluene, and cadmium. Groundwater was contaminated with benzene, ethylbenzene, trimethylbenzene, xylenes, naphthalene, toluene, cadmium, and lead. A sediment sample was contaminated with cadmium, chromium and lead.

Weston Solutions, Inc. (Weston), an EPA Superfund Technical Assessment and Response Team, conducted an emergency removal assessment (Removal Assessment

Report, Revision 2) for EPA Region 4 Emergency Removal and Remediation Branch dated August 5, 2005 (Ref. 4). ADEM provided site and local knowledge for sampling activities (Att. 4). During the removal assessment, the laboratory and storage building were entered. The site's contents were inventoried and sampled (Ref. 4).

The above ground waste streams at the site are currently being addressed. A detailed chronology for GAMXX site activities has been assembled (Att. 6).

### **3. WASTE/SOURCE SAMPLING**

#### **3.1 Sample Locations**

During the 2005 Removal Assessment Report, Revision 2 conducted by Weston Solutions, Inc., various waste materials were located around the refinery in the processing areas, storage area, the storage building, laboratory, and the main office building (Ref. 4). Twenty-three transformers thought to contain PCBs were located in buildings and other area onsite (pp. 6). A sample from one of the transformers was submitted for laboratory analysis by the On-Scene Coordinator (OSC). During the removal assessment the contents of ten of the 125-150 drums stored inside the warehouse were submitted to HazCat<sup>®</sup> analysis with four of the drum samples submitted by the OSC for laboratory analysis. Further degradation of the insulation surrounding the external piping and columns has occurred due to age and activity from Hurricane Ivan. EPA and its associates surveyed the areas of piping system around the facility and collected 22 bulk samples. Two of these samples tested positive for asbestos. Used processing equipment and catalyst beads were scattered around the warehouse and adjacent areas.

#### **3.2 Analytical Results**

According to Hamilton Blvd., LLC, their remediation plan addressed the capacitors and transformers, solid/liquid wastes in drums in the warehouse, and asbestos work (Ref. 6). The 26 PCB-containing (>500 ppm) capacitors and the 4 transformers with PCB (<500 ppm) were drained, flushed and the oil segregated into separate approved containers. The PCB oil was transported to permitted RCRA/TSCA waste disposal facilities. The empty PCB-containing transformers and capacitors were staged inside a building waiting for disposal. The remaining transformers and capacitors on-site contain no PCB (Att. 5). The jet fuel sample containers and drums filled with lube and hydraulic oils were transported and recycled at Oil Recovery, Inc., Mobile, Alabama (Ref. 6). Approximately 700 reagents, chemicals, liquid and small quantities of solid materials from the on-site laboratory were stabilized, lab-packed and sent to permitted RCRA hazardous waste disposal facilities. Gulf Services, Inc. containerized 165 drums of non-hazardous spent catalyst beads, sulfur, balls and solids. These drums were sent to permitted RCRA hazardous waste disposal facilities. ACT inventoried 142 additional items located during their hazardous survey. Hamilton Blvd., LLC has sampled the pipes and removed the asbestos from the site (Att. 5). On January 17, 2007, ADEM acknowledged that the above ground cleanup of the warehouse had been met (Ref. 9, 13)



### **3.3 Conclusions**

Hamilton Blvd., LLC has completed its remediation of the above ground contaminated sources. Remaining ASTs are to be addressed under a future remediation plan with VCP overview.

## **4. GROUNDWATER PATHWAY**

### **4.1 Hydrogeology**

No change.

### **4.2 Targets**

Limited sampling of the groundwater was conducted by Weston beginning March 14, 2005 (Ref. 4). Analysis of the UST area detected groundwater contamination by MTBE and manganese. Groundwater is to be addressed in a subsequent cleanup plan by Hamilton Blvd., LLC after above-ground cleanup is concluded (Ref. 9). Groundwater flow was estimated by the UST's monitoring wells to flow to the northeast. There are no monitoring wells to determine if contamination is continuing off-site (Ref. 4). During the 2005 and 2007 site inspection, it was observed that Tank-202 had leaked and contaminated the soil and possibly the groundwater around the tank (Att. 4, 5). The Mobile Area Water and Sewer System's drinking water is drawn from surface water west of Mobile (Big Creek Lake). The City of Theodore groundwater wells are located outside Gamxx's area of impact.

### **4.3 Groundwater Conclusions**

Although contaminants were found on-site three times above the background level, the chemicals were not detected above any individual chemical's Maximum Contamination Level (MCL) or Lifetime Health Advisory (LHA)(Ref. 4). No groundwater cleanup has occurred.

## **5. SURFACE WATER PATHWAY**

### **5.1 Hydrology**

There are two potential surface water pathways leading from Gamxx. The surface water pathway to the south consists of the drainage ditch adjacent to the railroad and North Fork of Deer River (Figs. 1, 6). The North Fork of the Deer River flows 1.69 miles to the Deer River. Deer River flows an additional 1.03 miles to Mobile Bay for a total drainage pathway of 12.28 miles. The southern pathway appears to have been blocked at the southern corner of the site, but an alternate flow pathway may still exist. The main surface water pathway appears to flow into Alligator Bayou and Dog River to the north. Alligator Bayou flows 3.51 miles to Dog River. Dog River flows an additional 1.41 miles to Mobile Bay for a total of 10.08 miles along this pathway. There is the potential for surface to groundwater contamination from water infiltrating through the contaminated soil into the groundwater.

## 5.2 Targets

The site is situated in an industrial and distribution area with scattered commercial buildings nearby. There are no on-site residents or children surrounding the site. Prior to Hamilton Blvd LLC's repair of the fence and gates, individuals trespassed and were found fishing in the fire pond. The fire pond was sampled by EPA on March 15, 2005. The nearest public drinking water intake is located on Big Creek Lake which is located over 14 miles northwest of the site.

The closest fishery to the north is Alligator Bayou which flows into Dog River and Mobile Bay. The fishery to the south is North Fork of Deer River which flows into Deer River and Mobile Bay. There are no flow monitoring stations located on these rivers; flow rates have been estimated. All of the stream segments are in the minimal stream category (<10 cubic feet per second) except the segment of the Dog River which is in the small to moderate stream category (10 to 100 cfs). Alligator Bayou and Deer River are classified "Fish and Wildlife" while Dog River is classified as "Swimming/Fish and Wildlife" (Ref. 14). Mobile Bay is classified in three categories along the 15-downstream miles: "Fish and Wildlife", "Swimming/Fish and Wildlife", and "Shellfish Harvesting/Fish and Wildlife". There are approximately 12.8 miles of wetlands located along the surface water pathway.

Along the 15-downstream miles associated with Gamxx are aquatic endangered, threatened, or candidate-for-listing species which could be impacted by this site. The following eleven aquatic endangered species are listed for Baldwin and Mobile Counties: (endangered species) Alabama red-bellied turtle, *Pseudemys alabamensis*; Alabama sturgeon, *Scaphirhynchus suttkusi*; Heavy pigtoe mussel, *Pleurobema taitianum*; Least tern, *Sterna antillarum*; West Indian manatee, *Trichechus manatus*; Wood stork, *Mycteria Americana*; (threatened species) Flatwoods salamander, *Ambystoma cingulatum* (Possible Occurrence); Gulf sturgeon, *Acipenser oxyrinchus desotoi*; Inflated heelsplitter mussel, *Potamilus inflatus*; Piping plover, *Charadrius melodus* (Ref. 15).

## 5.3 Sample Locations

During the week of March 14, 2005, the only surface water sampling conducted by Weston was two sediment samples from the fire pond. No inorganic or organic chemicals were detected above the PRG (Att. 4).

## 5.4 Surface Water Conclusions

No analysis indicates that a fishery has been impacted by the site, but the Mobile Bay estuary is a recreational and commercial fishery, as well as nursery ground for developing shellfish, fresh and saltwater fish and turtles. Due to the high water table in the area surrounding Mobile Bay, there is a risk of contamination to the nearby rivers and bay. The area is highly industrialized; therefore, it would be difficult to determine Gamxx's contribution to the total contamination in the area.



## 6. SOIL EXPOSURE AND AIR PATHWAYS

### 6.1 Physical Conditions

Continued disintegration of the insulation on the external piping and columns due to age and hurricane activity has occurred. Weston surveyed the areas of piping system around the facility and collected 22 bulk samples (Att. 4, pp. 4-5). Two of these samples tested positive for asbestos.

Tank-202 has leaked and contaminated the soil and possibly the groundwater around the tank (Att. 4, 5).

### 6.2 Soil and Air Targets

The site is bordered on the north by Hamilton Boulevard with a few businesses (Ref. 3). It is bordered on the east by Rangeline Road and on the west by woods and Taylor-Wharton Plant/Harsco Corp. On the south it is bordered by railroad tracks separating the site from Kerr-McGee Chemical Corp. (Ref. 2; 3 Exhibit E-2). The site is connected to the satellite storage site called Seabury Station (AL0002368827) in Kushla, Alabama, by a 26-mile pipeline.

The site is inactive with no permanent on-site workers or residential individuals identified. The 2000 Census states that the average household size for Mobile County is 2.61 persons and the average household size for the City of Mobile is 2.46 persons (Ref. 16). Currently there are 15,799 individuals within the one mile of the site (Att. 1).

Site Reassessment GAMXX-AAI Energy Inc., Site Theodore, Mobile County, Alabama Demographic Data Four Mile Radius	
Distance From Site (miles)	Population
0.00-0.25	41
0.25-0.50	100
0.50-1.0	374
1.0-2.0	1,493
2.0-3.0	3,683
3.0-4.0	10,108
Total Population	

The following six terrestrial endangered species are listed for Jackson County: (endangered species) Red-cockaded woodpecker, *Picoides borealis*; Louisiana quillwort, *Isoetes louisianensis* (Possible Occurrence); (threatened species) Bald eagle, *Haliaeetus leucocephalus*; Eastern indigo snake, *Drymarchon corais couperi*; Gopher tortoise, *Gopherus polyphemus*; (candidate species) Black pine snake, *Pituophis melanoleucus lodingi* (Ref. 15).

During the week of March 14, 2005, a total of 22 surficial soil samples were collected. Twelve subsurface soil samples and 2 sediment samples were also collected during the removal assessment (Ref. 4). Weston estimated that approximately 7,500 cubic yards of soil is contaminated with metals, VOC and SVOC above EPA's screening levels (pp.3). Weston determined that the surface soils were contaminated with the iron and organics above the Region 9 PRGs for industrial sites. Metals from subsurface soil samples were not above the Region 9 PRGs for industrial sites but organics were contaminated above the Region 9 PRGs for industrial sites.

Hamilton Blvd., LLC has sampled the insulation surrounding the external piping and columns and removed the asbestos from the site (Att. 5).

### **6.3 Soil Exposure and Air Pathway Conclusions**

The soil at the site has been impacted by metals and organic compounds. Additional sampling is needed to delineate the contamination from metal and organic compounds in the surficial and subsurface soils. Since asbestos at the site has been removed, the only air pathway concern would be the contents of the tanks.

## **7. SUMMARY AND CONCLUSIONS**

From its origin in December 1963 until 2007, contamination of the groundwater, soil and buildings by asbestos, metals, and PCBs and other organic compounds is suspected to have occurred at the Gamxx site. The State Voluntary Cleanup Program utilizes the ARBCA chemical standards to determine cleanup standards. Hamilton Blvd., LLC accomplished its warehouse cleanup and other activities under its VCP removal plan. Remediation of soil contamination, deteriorated ASTs and Tank-202's contaminated soil still need to be addressed. Hamilton Blvd., LLC will be addressing these issues under other future removal assessments. At the time of this report, the facility's participation in the VCP, to include assessment and remediation, justify the recommendation that there is no further CERCLA action necessary at this site.



## REFERENCES

1. Trimble Navigation Limited, Surveying & Mapping Division, GeoExplorer II, Operation Manual, Part Number 28801-00, Revision A, April 1996, pp. 1-1 thru 1-6.
2. Prudential Real Estate Affiliates, Inc, Property For Sale: Gamxx Energy Inc., Theodore, Refinery Site, 2003.
3. J. Stephen Harvey, McDowell Knight Roedder & Sledge, LLC, Application for Voluntary Cleanup Program Gamxx Refinery Site, Theodore, Alabama, April 18, 2006, p. 3, Exhibit E-2.
4. Weston Solutions, Inc., Removal Assessment Report, Revision 2, Gamxx Refinery, Theodore, Mobile County, Alabama, EPA Contract No. 68-W-00-123, August 5, 2005, pp. 3-6, 8-12.
5. Mobile County Tax Assessor, Tax Return List Real and Personal Property – Mobile County, AL, Hamilton Boulevard LLC, 2007.
6. J. Stephen Harvey, McDowell Knight Roedder & Sledge, LLC, Application for Voluntary Cleanup Program Gamxx Refinery Site, Theodore, Alabama, December 5, 2006, pp. 2.
7. Bonnie L. Temple, ADEM, Land Division, Environmental Services Branch, Assessment Section, Preliminary Assessment: AAI-GAMXX, EPA ID No. ALD095697058, Cerclis Ref. No. 6671, May 22, 1997, pp. 2.
8. Securities and Exchange Commission, Castle Energy Corporation Form 10-K; Department of State, Pennsylvania, Business Entity Filing History: Alexander-Allen, Inc.; and Louisiana Secretary of State, Detailed Record: Gamxx Energy, Inc., February 8, 2006.
9. J. Stephen Harvey, McDowell Knight Roedder & Sledge, LLC, Former GAMXX Refinery Site Voluntary Clean Up Program Site Number 461-9415, January 29, 2007, pp. 1-3.
10. Lawrence A Norris, ADEM, Land Division, Environmental Services Branch, Redevelopment Section, Former GAMXX Refinery Site, January 18, 2007.
11. Phillip Skaggs, ADEM, Field Operations, AAI-Gamxx Site Investigation, EPA ID No. ALD095697058, CERCLIS Ref. No. 6671, April, 28, 1999.
12. Analytical Chemical Testing Laboratory, Inc., Draft Castle Alabama Holdings, LLC Former GAMXX Facility Phase II Assessment Report, ACT Project No. 21.21458.0001, 2002.
13. Antwan Parker, ADEM, Land Division, Environmental Services Branch, Redevelopment Section, GAMXX Energy compliance letter, January 17, 2007.

14. ADEM, Water Division, Water Quality Branch, FINAL Mobile River Basin Classified Water: Water Use Classifications for Interstate and Intrastate Waters, Effective Date: January 12, 2001.
15. U.S. Fish and Wildlife Service (FWS), Daphne Field Office, "Alabama Federally Listed Species By County," <http://southeast.fws.gov/es/county%20lists.htm>, August 21, 2006.
16. U.S. Census Bureau, State and County Quick Facts: Mobile County, Alabama and Mobile (city), Alabama, <http://www.quickfacts.census.gov/qfd/states/01/01097.html> and <http://www.quickfacts.census.gov/qfd/states/01/0150000.html>, September 12, 2007.

## ATTACHMENTS

1. Joseph L. Ford, ADEM, Permits and Services Division, Information Systems Branch, Comprehensive Exposure Pathway Target Map, Map assembled and graphic additions made utilizing Environmental Systems Research Institute, Inc. software, All rights reserved, ArcView GIS 3.2, Copyright © 1992-2002, Background image U.S.G.S. 7.5 Minute Series (Scale 1:24,000) Topographic Quadrangle Maps of Alabama: Bellefontaine, Coden, Daphne, Grand Bay, Heron Bay, Hollingers Island, Isles Aux Herbes, Little Dauphin Island, Little Point Clear, Stelmo, and Theodore, Alabama, May 3, 2007.
2. Bonnie L. Temple, ADEM: Land Division, Hazardous Waste Branch, Site Assessment Unit, Trip Report for AAI-GAMXX, Theodore, Alabama, ALD095697058, CERCLIS Ref. No. 6671, and Seabury Station, Mobile, Mobile County, Alabama, CERCLIS No. 6798, December 9, 2004.
3. Bonnie L. Temple, ADEM, Land Division, Environmental Assessment Section, Photodocumentation Log for GAMXX Oil Refinery, Theodore, Alabama, ALD095697058, CERCLIS Ref. No. 6671, December 6, 2004.
4. Bonnie L. Temple, ADEM: Land Division, Hazardous Waste Branch, Site Assessment Unit, Trip Report for AAI-GAMXX, Theodore, Alabama, Photographs and Site Map, ALD095697058, CERCLIS Ref. No. 6671, and Seabury Station, Mobile, Mobile County, Alabama, CERCLIS No. 6798, March 25, 2005.
5. Bonnie L. Temple, ADEM: Land Division, Environmental Services Branch, Assessment Section, Trip Report: Former GAMXX Oil Refinery, Theodore, Alabama, Site Map, Field Notes, Photographs, , ALD095697058, CERCLIS Ref. No. 6671, January 16, 2007.
6. Bonnie L. Temple, ADEM: Land Division, Environmental Services Branch, Assessment Section, Chronology for GAMXX-AAI Energy Inc. and Seabury Station, Mobile County, Alabama, July 25, 2006.

**FIGURE**

**1**





GAMXX REFINERY  
THEODORE, MOBILE COUNTY, ALABAMA

DRAWN: J. J. MILLER	DATE: 12/31/02	W.O. NO.: 12587-001-001-0256
EPA ID NO:		TOD NO.: 4W-04-05-A-004



**FIGURE**

**2**



Figure 2: Comparison photographs of view inside GAMXX storage building with the doors open. Left photograph shows the state of the building with its drums and spilled materials prior to EPA sampling activities on December 14, 2005. The right photograph shows its status on January 11, 2007 after Hamilton Blvd, LLC had sampled and disposed of drums. The floor was swept but not cleaned.

**FIGURE**

**3**



Figure 3: Comparison photographs of view of back of warehouse inside GAMXX storage building. Left photograph shows the state of the building with its spilled materials prior to EPA sampling activities on December 14, 2005. The right photograph shows its status on January 11, 2007 after Hamilton Blvd, LLC had cleaned up by sampling and disposing of materials. The floor was swept but not cleaned. Note white “sleeves” to go around pipes.

**FIGURE**

**4**



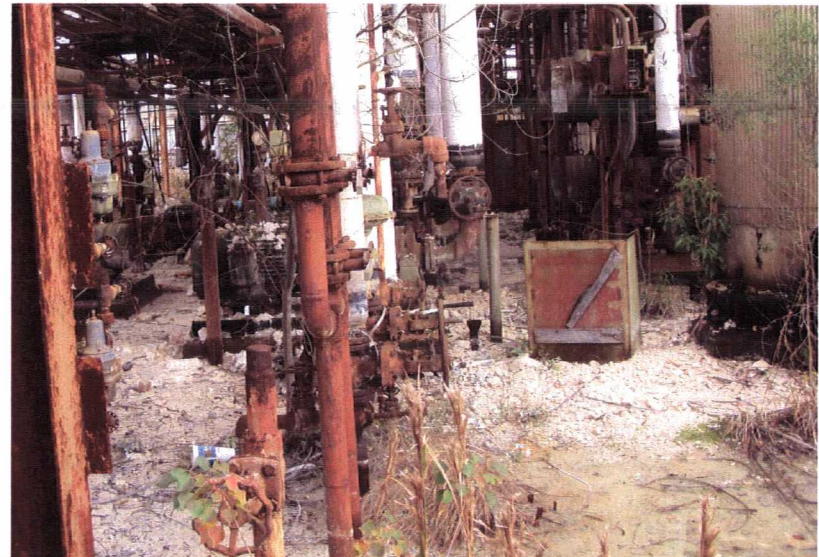


Figure 4: Top photographs are of photographs in crude oil processing area from December 6, 2004 showing pipe insulation falling from pipes. Bottom photograph collected from area perpendicular to top photographs showing clean up that has occurred by Hamilton Blvd LLC.

**FIGURE**

**5**





Figure 5: The top two photographs, from December 6, 2004, show the storage area for processing equipment and catalyst beads. The bottom photographs from January 11, 2007 shows that the area of beads have been removed by Hamilton Blvd LLC.

**FIGURE**

**6**





Figure 6: Comparison photographs of waste water treatment unit/oil and water separator. Top photograph from April 17, 1997 showing the upper/north end of the WWTP prior to discharge into railroad ditch beyond trees. Lower left photograph is from April 17, 1997 showing the lower/south end of the WWTP. Lower right photograph is from January 11, 2007 showing the lower/south end of the WWTP as it now looks.



**FIGURE**

**7**

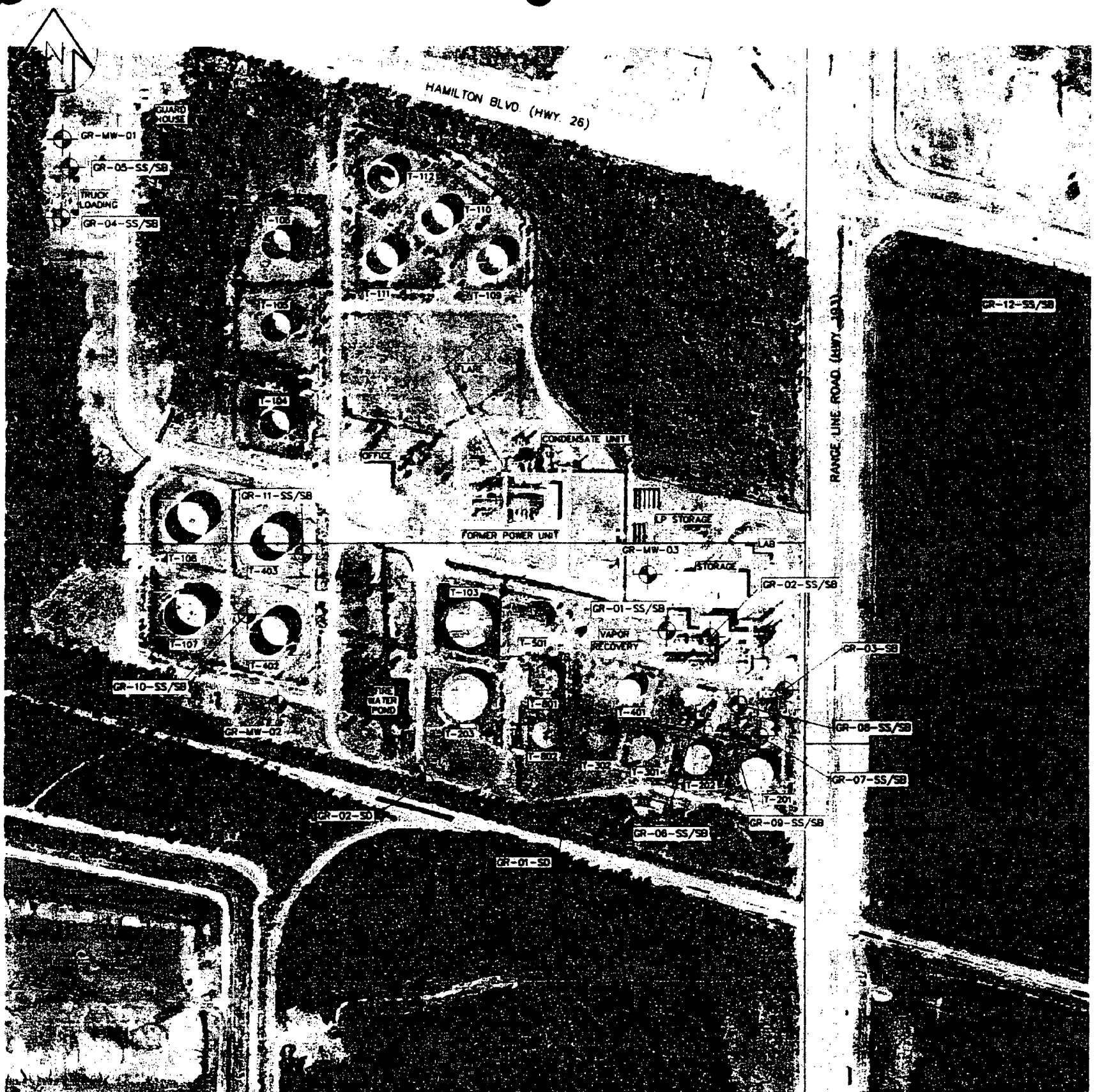


Figure 7: Aerial view of the Gamxx refinery with sample locations, tank numbers and areas listed. From Weston Removal Assessment Report, Revision 2, August 5, 2005.

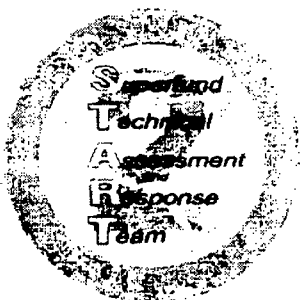
#### LEGEND

- SAMPLE LOCATION
- SS SURFACE SOIL SAMPLE
- SB SUBSURFACE SOIL SAMPLE
- SD SEDIMENT SAMPLE
- MW MONITORING WELL

added GR-08-SS/SB

GAMXX REFINERY  
THEODORE, MOBILE COUNTY, ALABAMA

SAMPLE LOCATION MAP  
GAMXX REFINERY  
FIGURE 5 (Corrected)



**WESTON**  
CONSTRUCTION

DRAWN:	DATE:	W.O. NO.:
J. MILLER	09/02/04	gamxx.dwg
EPA ID NO.:		12537-001-001-0256
		IDD NO.:
		4W-04-05-A-304



# REFERENCE

## I

# 1 GPS and the GeoExplorer II

---

This chapter covers some basic GPS concepts and information about the GeoExplorer II receiver that can help you use your mapping system more efficiently. The *Mapping System General Reference* has a detailed discussion on GPS and GIS that we recommend you read.

The topics covered in this chapter include:

- GPS concepts
  - The GeoExplorer II mapping system
  - GeoExplorer II accuracy
  - Differential correction

## 1.1 GPS Concepts

GPS (Global Positioning System) is a satellite-based positioning system operated by the U.S. Department of Defense (DoD). GPS involves three segments: space, control, and the user.

### 1.1.1 Space

The space segment consists of up to 24 NAVSTAR satellites (SVs). They are orbiting the earth every twelve hours at an altitude of about 12,600 miles (20,200 km). Each satellite contains several high-precision atomic clocks and constantly transmits radio signals using its own unique identifying code.

### 1.1.2 Control

The control segment is the Department of Defense which is responsible for maintaining the system. They have four ground-based monitor stations, three upload stations and a master control station. The monitor stations track the satellites continuously and provide data about the satellites to the master control station. The master control station calculates any changes in the satellites positions and timing and then forwards these to an upload station. The upload stations then transmit this data to each satellite at least once a day so that the satellites are sending accurate information about their orbit path back to the earth.

### 1.1.3 The User

This is where you come in. The user segment consists of civilian and military users with GPS receivers. GPS receivers use the signals sent from the satellites to determine where the satellites are and then use this information to calculate their own position on earth. The positions can be recorded for mapping and for navigation.



## 1.2 GeoExplorer II Mapping System

The GeoExplorer II mapping system consists of the GeoExplorer II GPS receiver, PC software, and accessories (cables, case and so on).

The GeoExplorer II receiver receives signals from the satellites and, because it knows where the satellites are, can calculate its current position. You can record the location of any geographic feature (point, line, or area) in the GeoExplorer II receiver. Using a data dictionary created with the PFINDER software, you can also enter descriptive data about the geographic features you are recording.

The GeoExplorer II receiver can calculate a new position more often than once per second. When you are moving, the receiver can compute your velocity and heading so you can navigate from one position to another. The GeoExplorer II receiver lets you monitor the accuracy of the positions you are recording. You can set parameters to limit the satellites that are used, allowing you to maintain your desired level of data integrity.

Once you return from the field you can transfer your GPS positions and attribute data from the GeoExplorer II receiver to the PFINDER software on the PC. The software lets you differentially correct your data to improve its accuracy, display the data graphically and transfer it to a GIS. For more information on differential correction, see section 1.4 on page 1-5.

## 1.3 GeoExplorer II Mapping System Accuracy

A variety of factors can affect the accuracy of your GPS data. Accuracy can range from 1 centimeter to over 100 meters. Some of the factors that affect the accuracy of your positions include: the number of satellites in view, the position of the satellites in relation to each other, the strengths of the satellite signals and the distance of your base GPS receiver) from your rover (mobile GPS receiver). The most significant factor is your equipment and data processing methods.

In standard operation, the GeoExplorer II receiver provides horizontal accuracy typically in the order of 2 to 5 meters. To obtain this level of accuracy the GeoExplorer II receiver must be configured correctly and you must differentially correct your data. Without differential correction and with Selective Availability on, accuracy may only be within 100 meters CEP<sup>1</sup>. The configuration parameters that you need to set on the GeoExplorer II receiver are discussed in Chapter 4. Differential correction is discussed in section 1.4 on page 1-5.

The GeoExplorer II receiver can also record submeter point data. This involves setting some configuration parameters, working in High Accuracy mode, and recording a single position for 10 minutes. Data collected in High Accuracy mode must be differentially corrected with base data collected in High Accuracy mode (carrier phase data). It must then be processed using the optional Phase Processor software.



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**Note** – For more information on using the GeoExplorer II receiver to collect High Accuracy data, refer to the *Phase Processor Software User Guide*.

---

Accuracy can be affected by the Department of Defense, which has the ability to degrade GPS accuracy at any time with Selective Availability (S/A). When S/A is activated, the position accuracy of a GPS receiver may be 100 meters. S/A error can be almost completely removed through differential correction.



---

**Note** – For a comprehensive discussion on GPS accuracy, refer to Chapter 4 of the *Mapping Systems General Reference*.

---

---

<sup>1</sup> Circular Error Probable, meaning 50% of the collected points are within a circle of specified radius on a horizontal plane.

## 1.4 Differential Correction

Differential correction is a technique that uses an extra GPS receiver and some calculations to increase the accuracy of GPS positions. It is based on the fact that any errors in a GPS signal are common to all receivers within about 300 miles (500 kilometers). Differential GPS can provide accuracies of submeter to 5 meters CEP.

Differential GPS requires that one receiver, known as the base station, be placed on a known reference position. The base station receives GPS data from all satellites in view. One or more rover receivers collect GPS data at unknown locations using a subset of the same satellites that the base is receiving data from. The GPS positions collected by the base station are compared to its known location and the offset differences are used to improve the accuracy of the rover positions.

Differential GPS corrections can be applied while the data is being collected in the field, using radios. This is called real-time differential GPS. Differential corrections can also be applied in the office once the rover and base station files are transferred to a PC. This is called postprocessed differential correction.

### 1.4.1 Real-time Differential Correction

In real-time differential correction, the base station calculates and, using radios, immediately broadcasts a correction message for each satellite as it receives the GPS data. This correction is broadcast to the roving GeoExplorer II receiver which applies the correction to the position it is computing. The result is that the position displayed on the GeoExplorer II receiver is differentially corrected in real-time. This method should be used if you need to know your position accurately while in the field. As they are calculated the corrected positions can be recorded in a file or stored as waypoints.

The GeoExplorer II receiver can use RTCM SC-104 radio signals. Radio systems suitable for transmitting and receiving RTCM SC-104 signals are available. For more information on performing differential correction in real-time, see Appendix D.

### 1.4.2 Postprocessed Differential Correction

For postprocessed differential GPS, the base station stores time-tagged data for each satellite in a computer file. The roving GeoExplorer II receiver records its positions in a file that is later transferred to a PC. The two files are processed with the PFINDER software and the output is a differentially corrected rover file.

A unique feature of all Trimble GPS Pathfinder systems, including the GeoExplorer II receiver, is that they can record both uncorrected and real-time differential GPS corrected positions. If the differential GPS radio data link is lost or becomes intermittent, the GeoExplorer II receiver continues to store uncorrected positions that can be corrected back in the office.



**Note** – For a more detailed discussion on differential correction refer to Chapter 1 of the *Mapping Systems General Reference* manual. For instructions on performing differential correction refer to your *PFINDER Software User Guide*.

# REFERENCE

2

# PROPERTY FOR SALE

## **GAMXX ENERGY INC.**

### **THEODORE REFINERY SITE** **(MORTGAGEE INTEREST)**



- Located in the Theodore Industrial Park at the intersection of Rangeline Road and Hamilton Boulevard.
- Rail service provided by CSX railroad.
- Connects to EOTT Ten Mile Station and GAMXX Oil Storage facility at Kushla by 10" Dia. oil pipeline. (offered separately).
- Suitable for rehabilitation as specialty refinery or oil storage/distribution.
- Suitable for utilization as manufacturing site and/or distribution site with access to rail and interstate highway.
- Mortgagee Interest being sold is that of Castle Alabama Holdings, LLC.
- Property is offered as-is.
- Phase II Environmental Evaluation available to prospective purchaser.
- Potential eligibility for Alabama Department of Environmental Management "Brownfield" Program.
- Buyer to perform due diligence as to property descriptions, environmental concerns and mortgagee interest being offered for sale.



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**For Additional Information Contact:**

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**Cell: 251-510-6680**

**e-mail: bobcooper@prucooper.com**

**Angela McArthur**


**Page: 251-341-5851**

**e-mail: aminala@concentric.net**

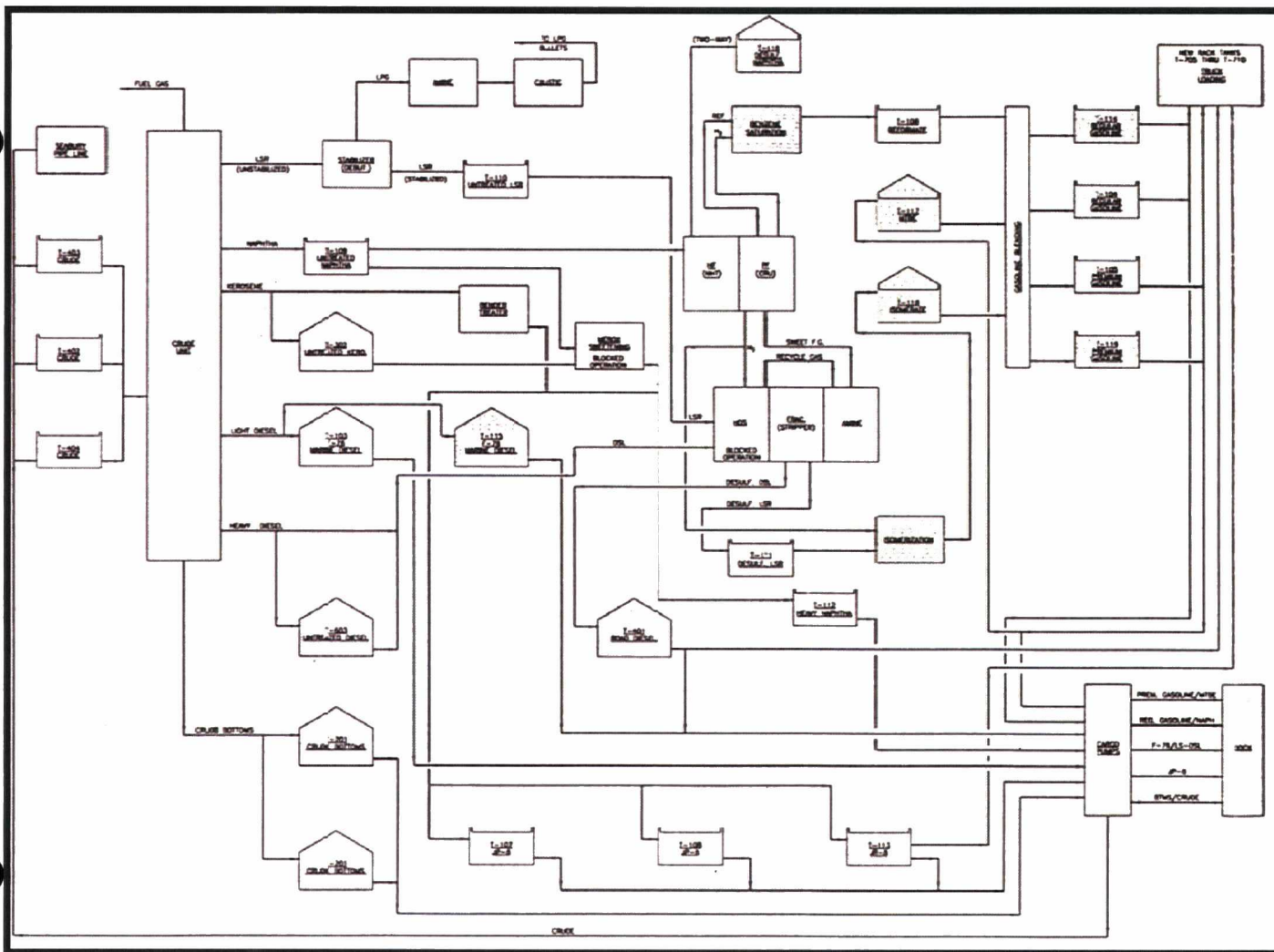
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## REFINERY BLOCK FLOW DIAGRAM

(Reference Only)

### Notes:

- The crude oil pipeline & Seabury Station storage & pumping facility are not included with the refinery package.
- The ship/barge docks and associated piping no longer exist. The dock facility was absorbed into the "homeport"



# **PROPERTY FOR SALE**

## **GAMXX ENERGY INC.**

(MORTGAGEE INTEREST)

## **THEODORE REFINERY**

### **PREFACE:**

Castle Alabama Holdings, LLC, an Alabama limited liability company ('CAH') owns an indebtedness secured by a mortgage obligation of GAMXX Energy, INC.. CAH is offering for sale, through Prudential Cooper & Co. Inc. – as their agent, their Mortgage position or, in the event that CAH should foreclose the Mortgage as to one or more parcels of the Property and purchase such parcel(s) at the foreclosure sale, or accept a deed in lieu of foreclosure as to one or more parcels, such parcels.

Any sale shall include all of the mortgagee's right, title and interest in and to all improvements (including fixtures) located on or attached to the Property on the date of sale.

In any sale of CAH's Mortgage position on the Property, or the Property, the purchaser shall take CAH's interest in the Property, or the Property, as the case may be in the Property's then condition, AS IS, WHERE IS, with no warranties whatsoever as to the condition of the property. It is incumbent on any prospective purchaser to perform due diligence as to the "right, title and interest" to be purchased and the conditions of the Property, environmental issues and any improvements (including fixtures) to be included in the sale.

### **SUMMARY:**

Key features of this site include its size and location. The refinery site consists of 129+/- contiguous acres in a heavy industrial and distribution area adjacent to Mobile, Alabama. Rail service is provided by CSX Railroad. Access to Interstate 10 and Interstate 65 is provided by a 4 lane industrial highway and is within 3 miles. The site is also in close proximity to a major intermodal (container) facility being constructed at the Port of Mobile by the Alabama State Docks. Air freight service is available at the Brookley Air Center which is also conveniently accessed from this site.

The refinery facilities consists of a 129+/- acre crude oil refinery located in Theodore, Alabama at the intersection of Hamilton Boulevard and Range Line Road. The refinery site is connected to Seabury Station, a crude oil storage terminal and pumping station located at Kushla, AL by a 26+/- mile crude oil pipeline. Seabury Station and the connecting pipeline are marketed as separate items. The former GAMXX ship/barge dock facility was absorbed by the Mobile "Homeport" construction and was not replaced.



The GAMXX Theodore Refinery was originally built in 1967 to provide military fuel, commercial jet fuel and marine diesel fuel. It was operated continuously until 1983 by Marion Oil Corporation. It was operated by GAMXX Energy Inc. in 1987-1988. The last known operation was a demonstration run in 1988. As recently as 1999 the former ownership contracted for engineering evaluations for a possible reconfiguration and re-start. As a result, engineering records and documents may be available to parties interested in refurbishing the refinery, or utilizing it for oil-fuel storage and distribution.

The refinery, as currently configured, has an estimated processing capacity of approximately 28,000 barrels per day of condensate-type crude oil. The refinery has a storage capacity of approximately 1.27 million barrels. Overall, the refinery has 11 buildings with a combined space of over 29,000 SF, including a laboratory, two control rooms, office space, warehouse space, a machine shop, boiler house and instrument repair facility.

The refinery has been inactive since approximately 1990 with no apparent maintenance or preservation. The buildings, equipment and facilities are in unknown condition.

A Phase II environmental survey has been performed on the refinery site and is available, for information purposes, to a potential purchaser.

While it is possible that a purchaser may wish to refurbish the refinery, it is likely that the best future use for this site would be as a manufacturing, industrial facility or distribution center due to its industrial location and access to interstate highways and rail service. Development of new manufacturing or industrial sites could be difficult in the Mobile Area due to environmental issues and neighborhood activism.

This site may qualify for environmental remediation under the Alabama Department of Environmental Regulations "Brownfield" program. The "Brownfield" program provides for a negotiated remediation, which can acknowledge future use as an industrial site, and provides the owner a limitation on future liability. The "Brownfield" program encourages "recycling" of potentially contaminated industrial sites for continued use by industry.

# REFERENCE

3

461-945

# McDOWELL KNIGHT

McDOWELL KNIGHT ROEDDER & SLEDGE L.L.C.  
LAWYERS

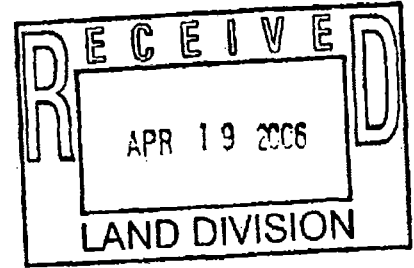
J. STEPHEN HARVEY

Direct Dial: 251-431-8819  
sharvey@mcowellknight.com

April 18, 2006

## FEDERAL EXPRESS

Mr. Larry Norris  
Alabama Department of Environmental Management  
1400 Coliseum Blvd.  
Montgomery, AL 36110-2059



Re: Application for Voluntary Cleanup Program  
Gamxx Refinery Site, Theodore, Alabama

Dear Larry:

Enclosed please find an Application for Voluntary Cleanup Program signed by Hamilton Blvd., LLC ("Applicant"), relating to that certain property known generally as the Gamxx Refinery site in the community of Theodore, Mobile County, Alabama. Also enclosed is a check for the application fee of \$2,000.00 made payable to ADEM.

Please process this application under the Alabama Land Recycling and Redevelopment Act at Ala. Code § 22-30E-1. Please let me know if you need anything further to process the application.

Very truly yours,

J. Stephen Harvey  
For the Firm

JSH/al  
M:190697  
Enclosures

## APPLICATION FOR VOLUNTARY CLEANUP PROGRAM

This application is made this 10<sup>th</sup> day of April, 2006, by Hamilton Blvd., L.L.C., an Alabama limited liability company ("Applicant"), pursuant to the Alabama Land Recycling and Redevelopment Act, Ala. Code § 22-30 E-1, *et seq.* (1975) (the "Act"), and Regulations §§ 335-15-3.01, *et seq.* (the "Regulations"), promulgated by the Alabama Department of Environmental Management ("ADEM") pursuant to the Act, for qualification and participation by Applicant and the property described below in ADEM's Brownfield Redevelopment and Voluntary Cleanup Program (the "Program").

(a) Applicant Description. The full name of the Applicant is Hamilton Blvd., L.L.C., an Alabama limited liability company. The Applicant's mailing address is c/o J. Stephen Harvey, McDowell Knight Roedder & Sledge, L.L.C., 63 South Royal Street, Suite 900, Mobile, Alabama 36602. The Applicant's telephone number is 251-431-8819 (J. Stephen Harvey).

(b) Location of Property. The real property covered by this Application consists of approximately 120 acres and is located at the southwest corner of Hamilton Boulevard and Rangeline Road with an address of 4000 Hamilton Blvd., Theodore, Alabama 36582 ("the Property"). The Property is located in the community of Theodore, Alabama, in Mobile County, Alabama. The Property consists of (i) the main refinery site of approximately 90 acres shown as the "Subject Property" on Exhibit A hereto (the "90 Acre Parcel") and (ii) an adjacent parcel consisting of approximately 30 acres and shown as the "Adjacent 30-Acre Gamxx Property" on Exhibit A (the "30 Acre Parcel"). Attached as Exhibit B is the United States Geological Survey (USGS) 7.5



Minute Quadrangle for this area with the Property delineated. The longitude of the Property is 88° 07' 30" West and the latitude of the Property is 30° 33' 00" North.

(c) Current Ownership Description. The Property is currently owned by Hamilton Blvd., L.L.C., the Applicant, which acquired ownership of the 90-Acre Parcel in October of 2005 and the 30-Acre Parcel in April of 2006. The Applicant's address and phone number are set forth above.

(d) History of Site. The site was used as a crude oil refinery from 1967 until approximately 1990. Marion Oil Corporation operated the refinery from 1967 until approximately 1983. Gamxx Energy, Inc. ("Gamxx") operated the refinery from 1985 until 1990. The Property was sold at auction to the State of Alabama in 1992 for non-payment of ad valorem taxes. The Property was vacant from the time the State purchased the Property at auction in 1992 until Applicant acquired it from the State in October of 2005 (90-Acre Parcel) and April of 2006 (30-Acre Parcel). Since its acquisition of the 90-Acre Parcel, Applicant has secured the site by putting up a gate, fencing and security cameras. Applicant has performed some limited testing of certain materials and substances located on the Property. Applicant has not attempted to remove, clean up or remediate any chemicals or hazardous materials at the site. A more detailed history of the Property and its operations is set forth in the Removal Assessment Report for the Property dated June 20, 2005 (the "Weston Report") and prepared by Weston Solutions, Inc. ("Weston") for the U.S. Environmental Protection Agency ("EPA"), a copy of which is on file with ADEM. A portion of the Weston Report is attached as Exhibit C hereto.

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USGS 17 km SW of Mobile, Alabama, United States 04 Mar 2002

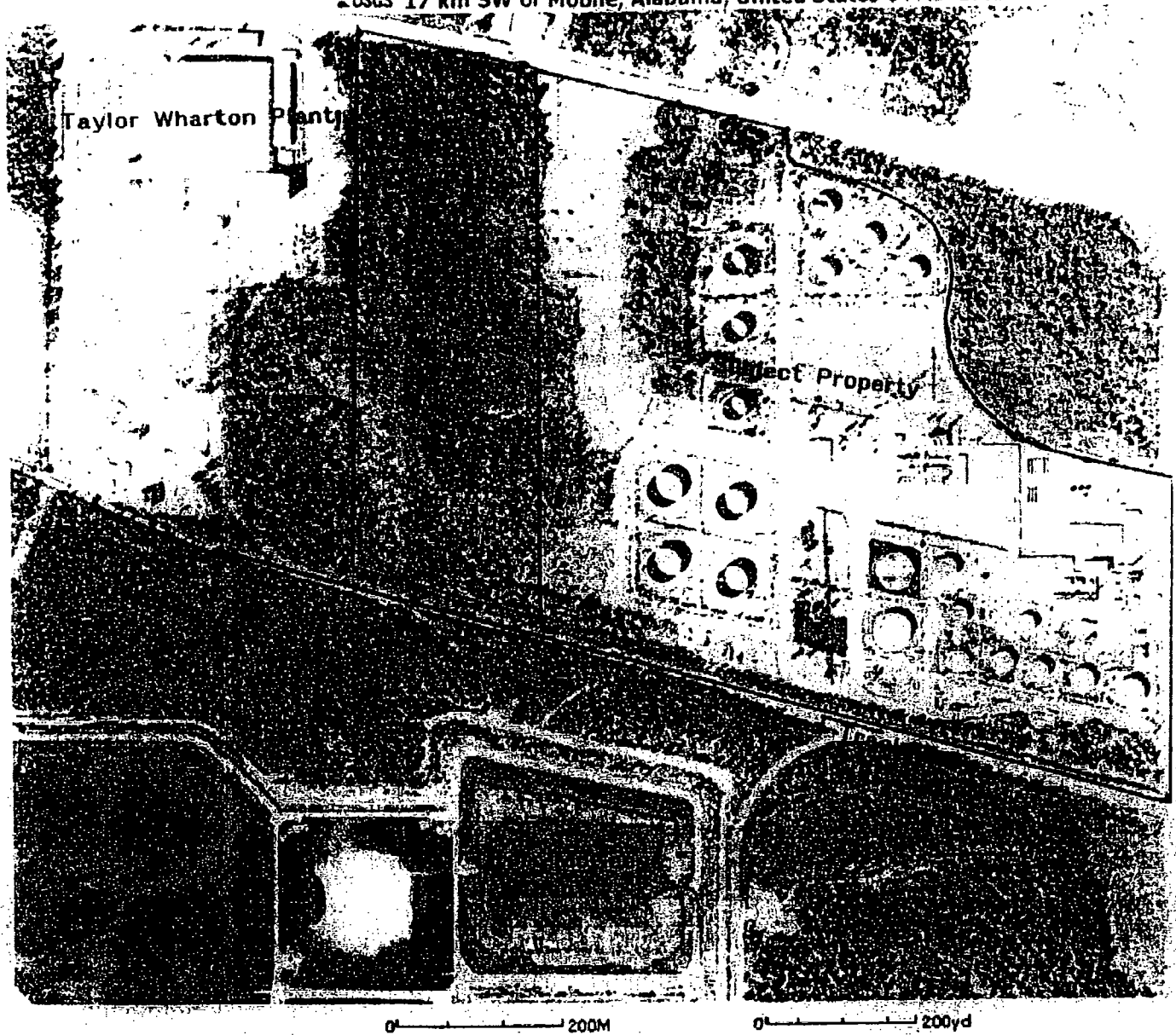
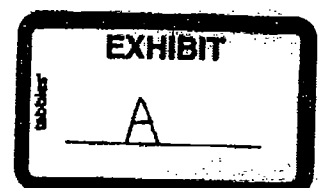


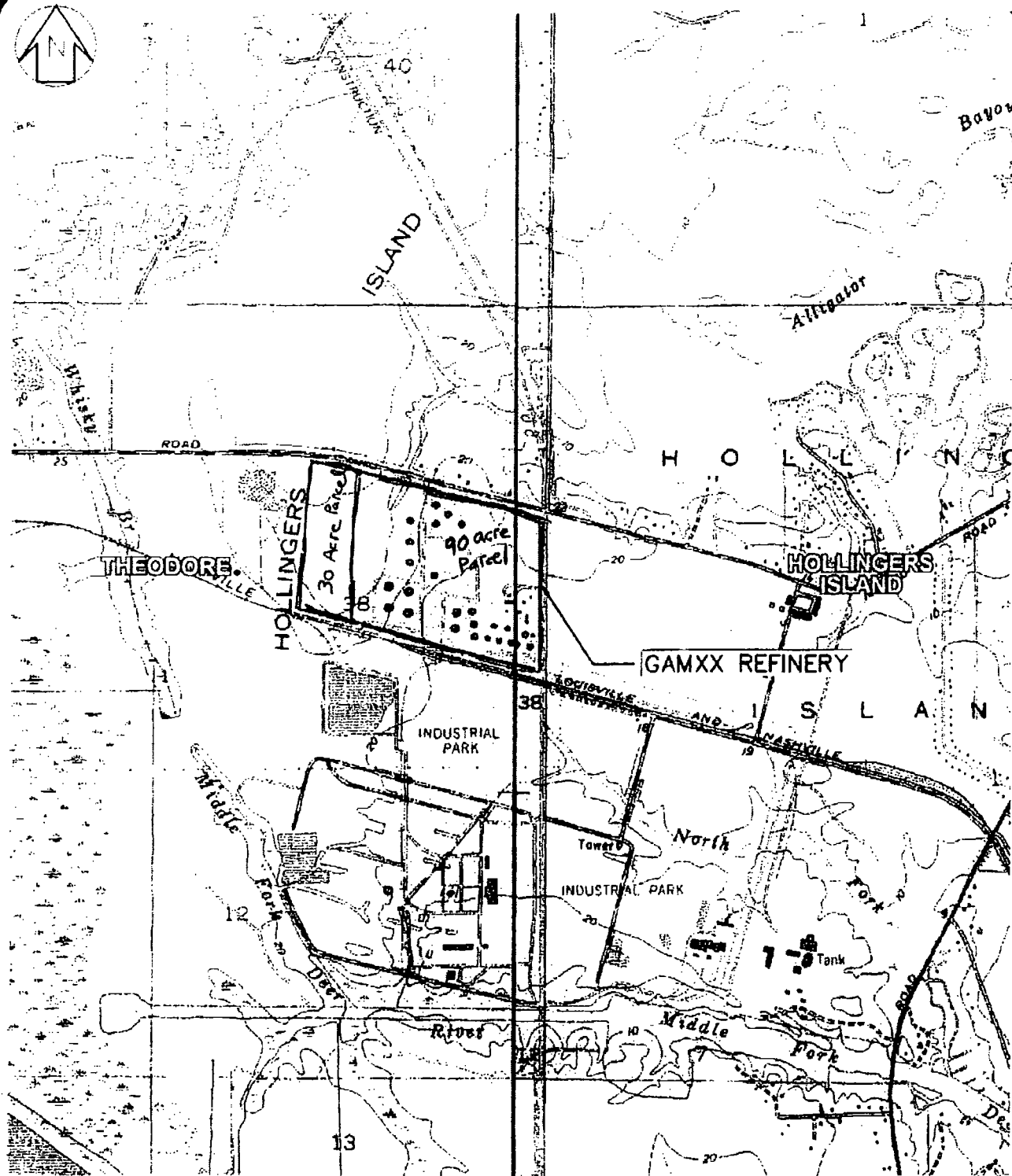
Image courtesy of the U.S. Geological Survey

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MODIFIED U.S.G.S. QUAD THEODORE AND HOLLINGERS ISLAND MAP (7.5 SERIES). DATED 1987, SCALE 1:2000.

**GAMXX REFINERY**  
**THEODORE, MOBILE COUNTY, ALABAMA**

**GENERAL SITE LOCATION MAP**  
**GAMXX REFINERY**  
FIGURE 1



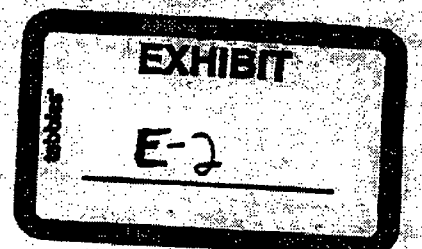
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DRAWN: J. MILLER	DATE: 09/02/04	W.O. NO.: gamxx.dwg 12587-001-001-0256
EPA ID NO.	TDD NO.: 4W-04-05-A-004	



**EXHIBIT**

**B**





# REFERENCE

4

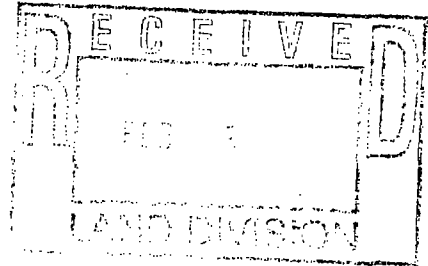
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BREAK: 3.8  
OTHER: 1.2



Weston Solutions, Inc.  
5430 Metric Place, Suite 100  
Norcross, Georgia 30092  
770-325-7900 Fax 770-325-7950

August 5, 2005

Mr. Terry Stilman  
On-Scene Coordinator  
U.S. Environmental Protection Agency  
61 Forsyth Street, SW, 11th Floor  
Atlanta, Georgia 30303



**Subject: Removal Assessment Report, Revision 2  
Gamxx Refinery  
EPA Contract No. 68-W-00-123  
Technical Direction Document (TDD) No. 4W-04-05-A-004  
Document Control No. WSI-GRS-0019**

Dear Mr. Stilman:

Weston Solutions, Inc., Superfund Technical Assessment and Response Team - 2 (START-2) is submitting one copy of the Removal Assessment Report, Revision 2 for the Gamxx Refinery in Theodore, Mobile County, Alabama.

Included with this submittal is a revised Figure 5 for Appendix A, and a copy of the summary data tables to replace as Appendix B. Please retain all other appendices and figures from the previous revision.

Please contact me at (770) 235-7944 if you have any questions or comments regarding this report.

Sincerely,  
Weston Solutions, Inc.

*Stacy L. Kowalski*

Stacy L. Kowalski  
START-2 Project Manager

Enclosure

cc: Dean Ullock, EPA On-Scene Coordinator  
Charles Swan, EPA Project Officer  
Karen Knight, Alternate EPA Project Officer  
Joseph Baer, START-2 Program Manager (w/o enclosure)  
Greg Harper, START-2 Removal Coordinator (w/o enclosure)  
START-2 File

**REMOVAL ASSESSMENT  
REPORT**

**GAMXX REFINERY  
THEODORE, MOBILE COUNTY, ALABAMA**

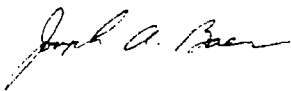
**Revision 2**

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region 4  
Atlanta, Georgia 30303**

Contract No.	:	68-W-00-123
TDD No.	:	4W-04-05-A-004
Work Order Number	:	12587.001.001.0256
Document Control No.	:	WSI-GRS-0019
Date Prepared	:	August 5, 2005
EPA Work Assignment Manager	:	Terry Stilman
Telephone No.	:	404-562-8748
Prepared by	:	Weston Solutions, Inc.- START-2
START Project Manager	:	Stacy L. Kowalski
Telephone No.	:	770-325-7944

Approved by:



---

Joseph A. Baer  
START-2 Program Manager

## **2.2 REGULATORY AND RELEASE HISTORY**

Very little regulatory information regarding the Gamxx Refinery, Facility ID Number 11998-097-001057, is available. However, in 1990, a Release Report was submitted to Alabama Department of Environmental Management (ADEM) regarding a release of gasoline products to the soils surrounding a former underground storage tank (UST) at the facility.

## **2.3 PREVIOUS INVESTIGATIONS**

On October 30, 1990, an ADEM UST Closure Site Assessment Report (USTCSAR) was submitted by Southern Earth Sciences, Inc. (SESI). During the closure, the UST system, associated piping run, and dispenser were removed. The UST had been used to store and dispense unleaded gasoline. The results of the USTCSAR revealed levels of benzene and xylene in excess of ADEM's initial screening levels present in soil samples collected from the sides of the UST excavation. Based on the findings of the USTCSAR, SESI filed a Release Report Form to ADEM and recommended a Preliminary Investigation be performed at the property.

In May 1998, a Site Investigation (SI) of the Gamxx facility was conducted by the ADEM Land Division. During the SI, two surface water samples, three sediment samples, one surface soil sample, two groundwater samples, and one waste (pile) samples were collected. The SI recommended that the sludges present at the site be removed and the drainage ditch be dredged to remove any contaminated sediments. The SI concluded that the threat to groundwater was minimal and that the wastes at the site are contained in such a manner as to not pose a threat to the environment. Therefore, the facility was recommended for no further remedial action planned (NFRAP).

A Phase II investigation of the Gamxx facility was conducted in April 2002 by ATC Associates, Inc., (ATC) for the refinery owners. The purpose of the investigation was to determine the presence or absence of subsurface soil or groundwater contamination at the property and whether any environmental liability exists and would warrant further evaluation. During the investigation, sediment, soil, and groundwater samples



On February 8, 2005, OSC Ullock and START-2 personnel performed a cursory asbestos survey to determine the presence or absence of asbestos at the Gamxx facility. For the purposes of the screening, the property was divided into two areas of interest based on construction dates. Random bulk samples were collected from homogeneous areas generally consisting of the piping systems, debris on the ground, and miscellaneous materials. During the survey, a total of 22 bulk samples (B-01 through B-22) were collected from various locations throughout the facility. Two samples (B-18 and B-21) tested positive for asbestos. Sample B-18 was collected from a greater than 14-inch pipe run and sample B-21 was collected from a 4- to 8-inch pipe run in the tank farm south of the new process unit (See Appendix D, photographs 1 and 2). A third sample (B-07) was collected from a less than 4-inch pipe run and revealed trace amounts of asbestos; however, based on the EPA definition, is considered non-asbestos containing material (ACM). Based on the limited number of samples collected, specific or definitive conclusions cannot be made; however, the results would suggest that:

- The thermal system insulation (TSI) materials at the site were at one time regularly maintained to the point, it would appear, a significant amount of the material has been potentially replaced with non-ACM components.
- The ACM present at the site is potentially limited and, in some case, contained to small areas.
- The likelihood of windborne exposure to asbestos from the materials and debris at the site is decreased by the apparent limited quantity of ACM.

In December 1997, the ADEM Land Division conducted a Preliminary Assessment (PA) of the Seabury Station. No samples were collected during the investigation and only a small limited spill at the facility was documented in the ADEM files. However, due to the presence of municipal wells within 2-miles of the property, ADEM recommended further investigations at the federal level. No additional information regarding previous investigations of the Seabury Station is available.

### **3.0 SITE ACTIVITIES**

During the week of March 14, 2005, EPA OSCs Stilman and Ullock, ADEM personnel, START-2 personnel, and members of the US Coast Guard Gulf Strike Team (GST) conducted removal assessment activities at the Gamxx refinery and the Seabury Station. Three distinct phases of site operations were undertaken: level

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number 5). The individual drum logs representing the results of the HazCat<sup>®</sup> analysis are presented as Appendix E.

Based on the HazCat<sup>®</sup> results, four drums (numbers 1, 2, 6, and 7) and the transformer (WS-11) were chosen by the OSC for laboratory analysis. The samples were collected by START-2 and GST and were labeled GR-WS-1, GR-WS-2, GR-WS-6, GR-WS-7, and GR-WS-11. The samples were sent to Analytical Services, Inc. (ASI) located in Norcross Georgia for analysis. They were analyzed for VOC, semi-volatile organic compounds (SVOC), Pesticides, PCB, Target Analyte List (TAL) Metals, pH, ignitability, and reactivity. The results of the waste analysis are summarized in Tables 1 and 2 located in Appendix B, and the complete set of analytical data is presented in Appendix C.

### **3.2 Assessment of Tanks and Piping**

During the removal assessment, START-2 refinery experts and GST personnel assessed the integrity of the existing tanks and piping associated with both the Gamxx Refinery and the Seabury Station. At the Gamxx Refinery, the ASTs on the south side of the property are in poor condition with structural integrity issues, and the piping leading to these tanks shows signs of decay; additionally, Tank 202 exhibited signs of leakage. Cracked concrete, rusted rebar, and rebar protruding out of the concrete columns in the condensate unit/cooling tower indicated poor structural integrity. The ASTs located on the north side of the property near the front gate and the vertical tanks and piping at the Mirox blending unit on the southeast east side of the facility near tank 202 are in good condition. The four tanks on the southwest corner of the property, west of the Fire Water pond, are in fair condition. The horizontal propane tanks located in the LP storage area appear to be in good condition. The tanks located to the east of the LP area are in the process of decay; however, no structural integrity issues are yet apparent. Tank 301 located in the southeast corner of the facility has a large hole in the side, which could have possibly been a result of the recent hurricanes to impact the area.

Overall, the buildings at the Gamxx Refinery are in good condition and no structural problems were noted. At the Seabury Station, all of the tanks are in good condition. An overflow sump is located on the property

subsurface soil samples were collected from depths ranging from 1- to 3-feet below ground surface (bgs). The exact location of the subsurface soil samples was determined based on VOC readings using the TVA-1000. The summary of analytical results is detailed in the following sections.

### **3.3.1.1 Surface soil samples**

- Inorganic constituents including aluminum, arsenic, barium, calcium, chromium, copper, iron, lead, magnesium, manganese, nickel, potassium, sodium, vanadium, and zinc were detected in the surface soil samples collected from the Gamxx Refinery. No inorganic constituents were detected at a level above the Region 9 Preliminary Remediation Goal (PRG) value for industrial soil.
- Organic constituents including benzene, toluene, ethylbenzene, and xylene (BTEX compounds), pyrene, benzo(a)anthracene, chrysene, benzo(a)pyrene, and cyclohexane were detected in surface soil samples GR-07-SS and GR-09-SS collected from the refinery. Benzo (a) anthracene and benzo (a) pyrene were the only organic constituents elevated above the PRG value for industrial soil. Several pesticides were also detected in the surface soil samples collected from the refinery; however, these constituents were not part of the normal operations at the facility and are not attributable to site processes.

### **3.3.1.2 Subsurface soil samples**

- Inorganic constituents including aluminum, arsenic, barium, chromium, iron, lead, manganese, potassium, sodium, vanadium, and zinc were detected at levels above background in the subsurface soil samples collected from the Gamxx Refinery. No constituents were detected above the PRG for industrial soil.
- Organic constituents including BTEX compounds, acetone, cyclohexane, naphthalene, fluoranthene, pyrene, benzo(a)anthracene, chrysene, benzo(a)pyrene, and Arochlor-1260 were all detected at elevated levels in several subsurface soil samples collected from the property. Benzo (a) anthracene and benzo (a) pyrene were the only constituents detected above the PRG for industrial soil. Several pesticides were detected in the subsurface soil samples; however, they are not attributable to the site

- Methylene chloride was the only organic constituent detected in the surface soil samples collected from the Seabury Station property. The detection was found in sample GR-14-SS at a level of 11 micrograms per kilogram ( $\mu\text{g/kg}$ ). No constituents were detected above the industrial soil PRG.

### **3.3.2.2 Subsurface soil samples**

- Inorganic constituents including aluminum, arsenic, barium, iron, lead, manganese, and vanadium were detected at levels above three times background in the subsurface soil samples collected from the Seabury Station. No inorganic constituents were elevated above the PRG for industrial soil.
- No organic constituents were detected in any of the subsurface soil samples collected from the Seabury Station property.

### **3.3.2.3 Sediment samples**

Four sediment samples were collected from the Seabury Station property. No background sediment sample was collected for comparison purposes; therefore, the sediment samples were compared to the PRG for industrial soil. No inorganic or organic constituents in the sediment samples were detected at levels above the PRG.

## **3.4 Groundwater and Surface Water Sampling**

START-2 collected five groundwater samples including one background groundwater sample from the Gamxxx Refinery during the investigation. The background sample was collected from a private well at the Atkinson Nursery located at 6200 Half Mile Road, approximately 3 miles southwest of the Gamxxx Refinery. Four permanent monitoring wells are located on the Gamxxx Refinery property in the area of the former underground storage tank. These monitoring wells were purged and sampled using a peristaltic pump. The purging of the wells was conducted until three stable readings of water quality were obtained. In order to provide the most conservative comparison, the groundwater constituents were compared to the EPA Maximum Contamination Limit (MCLs) where available, and the Lifetime Health Advisory (LHA) values

properties indicates that hazardous substances exist. Waste samples collected from various drums located at the Gamxx Refinery property revealed the presence of chromium, manganese, sodium hydroxide (based on the sodium content and the high pH), flammable liquids, BTEX compounds, 1,1,1-trichloroethylene, and PCBs. Soil sampling revealed the presence of elevated levels of several inorganic constituents including but not limited to arsenic, chromium, lead, manganese, mercury, nickel, and zinc; however, no inorganic constituents are elevated above the PRG for industrial soil. Organic constituents including but not limited to BTEX compounds; polyaromatic compounds (PAHs) including pyrene, chrysene, benzo(a)anthracene, and benzo(a)pyrene; PCBs, (specifically Arochlor-1260); cyclohexane, naphthalene, and methylcyclohexane were found in the soils at the Gamxx Refinery property. Benzo (a) anthracene and benzo (a) pyrene were the only organic constituents detected above the PRG for industrial soil. MTBE was detected in the groundwater sample collected from one monitoring well at the Gamxx Refinery property (MW-04) at a level three times above the background level. Manganese was detected above the LHA in the groundwater samples collected; however, no constituents were elevated above the MCLs. The property is not fenced and evidence of vagrancy and vandalism are present at the site.

Based on the analytical results of the removal assessment, hazardous substances are present in the soils and groundwater at the Gamxx Refinery property, and in the surficial soils at the Seabury Station property. Due to the presence of these constituents, and the absence of natural or manmade barriers preventing access to either property, additional EPA actions at these properties are warranted.



# REFERENCE

5

LIST OF PROPERTY RETURNED BY	HAMILTON BOULEVARD LLC
2007	3800 SOLLIE RD
060707 POST OFFICE ADDRESS	MOBILE AL 36695

**Mailing Add \_\_\_\_\_ :**

2007  
P070531 KEY 1240552  
A000000 STA113 TC

No. H

TA	2	3	4	5
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OATH TO BE ADMINISTERED TO TAXPAYER:

I DO SOLEMNLY SWEAR (OR AFFIRM) THAT THE FOREGOING LIST  
OF PROPERTY RETURNED BY

TS 1991

LOC:

COUNTY	TWP	AREA	SEC.	1/4 SEC.	BLOCK	PARCEL	CLASS	H'sted Exemption Valuation	Market Value	Taxpayer's Estimate of Value	MUN C O D E	Tax Assessor's Value For Assessment	Valuation By Board Of Equalization
02	38	01	38	0	000	030.	2						
REAL ESTATE DESCRIPTION ( NOTE WHETHER MINERAL RIGHT, SURFACE RIGHT, TIMBER RIGHT, TURPENTINE RIGHT OR OTHER RIGHT )													
#TAX DEED NO: 51173 BEG AT NW INT ALA STATE LINE RD TH NW ALG N R/W OF TO S R/W ISLAND RD TH SE R/W OF INT TH SE ALG W R/W LINE RD TH S ALG W R/W 855 #SEC 38 T6S R2W								#HAMILTON BOULEVARD LLC DOCKS TERMINAL RR & RANGE LAND RR 2647 FT-S- N 1985 FT-S-- ALG S R/W 1050 FT-S- TO W 2385 FT-S- TO W R/W RANGE FT-S- TO P08	1702000	0	340400		
#01 1-1 STY CORR MTL & BV OFFICE BLD W/OP									307400	0	61480		
#FE PAVE, CONC/L OTHER IMPROVEMENTS AND FEATURES									3500	0	700		
#02 1-1 STY CB BLD (GUARD HOUSE)									30200	0	6040		
#03 1-1 STY CB BLD (CONTROL ROOM)									22700	0	4540		
#04 1-1 STY CORR MTL BLD (OFFICES & LAB)									13900	0	2780		
----- CONTINUE -----													

(IF NOT HIS OWN PROPERTY HERE STATE THE CAPACITY IN WHICH HE RETURNS SUCH PROPERTY FOR ASSESSMENT  
IS A FULL AND COMPLETE RETURN OF ALL PROPERTY OWNED BY  
(HERE STATE IF THE PROPERTY RETURNED IS HIS OWN PROPERTY AND IF NOT HIS OWN)

PROPERTY. STATE THE NAME OF THE PERSON, CORPORATION OR ESTATE FOR WHOM THE PROPERTY IS RETURNED.

OR IN WHICH

HERE DESIGNATE THE OWNER FOR WHOM THE RETURN IS MADE

HAD INTEREST WHATEVER, THE SITUUS OF WHICH FOR TAXATION, OR EXEMPTION FROM TAXATION, IS IN THIS COUNTY, ON THE FIRST OF OCTOBER OF THE PRESENT YEAR, AND THAT THE IMPROVEMENTS ON LANDS LISTED IN THE FOREGOING SCHEDULE SO HELP MEVEN GOD, ALSO, DO HEREBY SOLEMNLY SWEAR (OR AFFIRM THAT I AM HEAD OF THE FAMILY, OR THE HEAD OF THE HOUSEHOLD, OR THE HEAD OF THE FARM, OR THE HEAD OF THE HOMESTEAD HAS BEEN MADE OR FILED BY OR ON BEHALF OF ANY MEMBER OF MY IMMEDIATE HOUSEHOLD AND THAT THE ITEMS OF THIS ASSESSMENT MARKED IS THE PROPERTY OF THE SAID HEIR, AND THAT THE SAME ARE NOT EXCLUDED FROM THE ASSESSMENT OF THE SAID ACRES OF SAID AREA. I UNDERSTAND THAT THE ASSESSMENT RETURN IS BEING MADE FOR THE YEAR OF OCTOBER 1 OF THE PRESENT YEAR AND THAT IF THIS RETURN IS SIGNED AND SIGNED BEFORE SAID DATE, I AM REQUIRED BY LAW TO REPORT ANY CHANGE AFFECTING SAID RETURN, IF ANY, TO THE COUNTY CLERK OF THE COUNTY OF SAID COUNTY, ON OR BEFORE SAID DATE, AND THAT THE TIME BETWEEN THE DATE OF SIGNING AND SAID DATE, OCTOBER 1 OF THE PRESENT YEAR,

## SIGN

HERE X

SUBSCRIBED AND SWORN TO BEFORE ME

I FURTHER SWEAR ( OR AFFIRM ) THAT I AM OR WILL BE 85 YEARS OF AGE

**BEFORE THE DATE COVERED BY THIS ASSESSMENT**

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WAS PERMANENTLY OR  
TOTALLY DISABLED BEFORE THE DATE COVERED BY THIS ASSESSMENT

## SIGN

HERE X

THIS 5 DAY OF \_\_\_\_\_ 20\_\_\_\_\_

I HEREBY CERTIFY THAT BEFORE TAKING THE FOREGOING ASSESSMENT LIST I ADMINISTERED THE OATH REQUIRED TO BE ADMINISTERED UNDER PARAGRAPH 40 OF TITLE 51 OF THE 1940 CODE OF ALABAMA AS AMENDED TO TAXPAYER OR AGENT, MAKING THIS RETURN AND THAT I INTERROGATED THE SAID PARTY AS THE LAW DIRECTS IN REGARD TO THE SAME.

MARILYN E. WOOD  
REVENUE COMMISSIONER MOBILE COUNTY

BY

[illegible]

2007 **Tax Return List Real and Personal Property - Mobile County, AL -** 2007  
 LIST OF PROPERTY RETURNED BY HAMILTON BOULEVARD LLC  
 2007 3800 SOLLIE RD  
 060707 POST OFFICE ADDRESS MOBILE AL 36695

**Mailing Add** \_\_\_\_\_ :

KEY 1240552  
 STA113 TC

No. H					
TA	1	2	3	4	5

PROPERTY LAST ASSESSED TO WHOM

GAMXX ENERGY INC

TS 1991

LOC:

OATH TO BE ADMINISTERED TO TAXPAYER:

I DO SOLEMNLY SWEAR (OR AFFIRM) THAT THE FOREGOING LIST OF PROPERTY RETURNED BY

(IF NOT HIS OWN PROPERTY HERE STATE THE CAPACITY IN WHICH HE RETURNS SUCH PROPERTY FOR ASSESSMENT)  
 IS A FULL AND COMPLETE RETURN OF ALL PROPERTY OWNED BY  
 (HERE STATE ME IF THE PROPERTY RETURNED IS HIS OWN PROPERTY AND IF NOT HIS OWN)

(IF PROPERTY, STATE THE NAME OF THE PERSON, CORPORATION OR ESTATE FOR WHOM THE PROPERTY IS RETURNED)

OR IN WHICH

(HERE DESIGNATE THE OWNER FOR WHOM THE RETURN IS MADE)  
 HAD INTEREST WHATEVER THE STATUS OF WHICH FOR TAXATION OR EXEMPTION FROM  
 TAXATION, IS IN THIS COUNTY, ON THE FIRST OF OCTOBER OF THE PRESENT YEAR, AND  
 OF THE IMPROVEMENTS ON LANDS LISTED IN THE FOREGOING SCHEDULE SO HELP ME  
 GOD, ALSO, I DO HEREBY SOLEMNLY SWEAR (OR AFFIRM) THAT I AM HEAD OF THE FAMI-  
 LY AND/OR THAT NO OTHER CLAIM OR EXEMPTION FROM STATE TAXES FOR  
 HOMESTEAD HAS BEEN MADE OR FILED BY OR ON BEHALF OF ANY MEMBER OF MY  
 IMMEDIATE HOUSEHOLD AND THAT THE ITEMS OF THIS ASSESSMENT MARKED IS THE  
 HOMESTEAD CLAIMED BY ME WHICH DOES NOT EXCEED \$2000.00 IN ASSESSED VALUE  
 NOR 180 ACRES IN AREA. I UNDERSTAND THAT THIS ASSESSMENT RETURN IS BEING MADE  
 AS OF OCTOBER 1 OF THE PRESENT YEAR AND THAT IF THIS RETURN IS SIGNED  
 BEFORE SAID DATE, I AM REQUIRED BY LAW TO REPORT ANY CHANGE AFFECTING  
 VALUE OF EXEMPTION CLAIMS WHICH OCCURS BETWEEN THE DATE OF SIGNING AND  
 SAID OCTOBER 1 OF THE PRESENT YEAR

**SIGN**

**HERE X**

SUBSCRIBED AND SWORN TO BEFORE ME

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WILL BE 65 YEARS OF AGE

BEFORE THE DATE COVERED BY THIS ASSESSMENT

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WAS PERMANENTLY OR  
 TOTALLY DISABLED BEFORE THE DATE COVERED BY THIS ASSESSMENT

**SIGN**

**HERE X**

THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 20 \_\_\_\_\_

I HEREBY CERTIFY THAT BEFORE TAKING THE FOREGOING  
 ASSESSMENT LIST I ADMINISTERED THE OATH REQUIRED TO BE  
 ADMINISTERED UNDER PARAGRAPH 40 OF TITLE 51 OF THE 1940  
 CODE OF ALABAMA AS AMENDED TO TAXPAYER OR AGENT, MAKING  
 THIS RETURN AND THAT I INTERROGATED THE SAID PARTY  
 AS THE LAW DIRECTS IN REGARD TO THE SAME

MARILYN E. WOOD  
 REVENUE COMMISSIONER MOBILE COUNTY

BY

VALUATION BY BOARD OF EQUALIZATION	1	PRICHARD VALUATION	2	CITRONELLE VALUATION	3	CHICKASAW VALUATION	4	MOBILE VALUATION	5	BAYOU LA BATRE VALUATION	6	SARALAND VALUATION	7	SATURDAY VALUATION	8	ORANGE ISLAND VALUATION	9	MT. VERNON VALUATION	TOTAL ASSESSED VALUE

REAL ESTATE DESCRIPTION (NOTE WHETHER MINERAL RIGHT, SURFACE RIGHT, TIMBER RIGHT, TURPENTINE RIGHT OR OTHER RIGHT)

#05 1-1 STY CB BLDG (ELECTRIC BLDG)

2200

0

440

#06 1-1 PREFAB METAL BLDG SHOP BLDG W/OFF & LOCKER RM  
 (MAINTENANCE)

19800

0

3960

#07 1-1 STY CB BLDG (ELECTRIC CONTROL CENTER)

4000

0

800

#08 1-1 STY PREFAB MTL BLD (AIR COMPRESSOR BLDG)

6200

0

1240

#09 1-1 STY PREFAB MTL BLD (MOTOR CONTROL CENTER) MCC8

1500

0

300

#10 1-1 STY CB BLD (MOTOR CONTROL CENTER MCC4)

400

0

80

#11 1-1 STY PREFAB MTL BLD & MEZZ (WHSE BLD WITH MEZZ  
 ADDN TO SHOP BLD)

24500

0

4900

----- CONTINUE -----

2007 **Tax Return List Real and Personal Property - Mobile County, AL - 2007**  
LIST OF PROPERTY RETURNED BY HAMILTON BOULEVARD LLC  
2007 3800 SOLLIE RD  
060707 POST OFFICE ADDRESS MOBILE AL 36695

Mailing Add : A

KEY 1240552  
STA113 TC

No. H					
TA	1	2	3	4	5

PROPERTY LAST ASSESSED TO WHOM

GAMXX ENERGY INC

TS 1991

LOC:

OATH TO BE ADMINISTERED TO TAXPAYER:

I DO SOLEMNLY SWEAR (OR AFFIRM) THAT THE FOREGOING LIST OF PROPERTY RETURNED BY

COUNTY	TWP	AREA	SEC.	1/4 SEC.	BLOCK	PARCEL	CLASS	Homestead Exemption Valuation	Market Value	Taxpayer's Estimate of Value	MUN. CODE	Tax Assessor's Value For Assessment	Valuation By Board Of Equalization
02	38	01	38	0	000	030.	2						
REAL ESTATE DESCRIPTION (NOTE WHETHER MINERAL RIGHT, SURFACE RIGHT, TIMBER RIGHT, TURPENTINE RIGHT OR OTHER RIGHT)													
#12 1-1 STY CB OFFICE BLD (POWERFORMER CONTROL BLDG) MCC5									41300	0		8260	
#13 1-1 STY PT WINDOW WALL PT CB BLDG (GUARD SHACK - GAMXX ENERGY INC)									4500	0		900	
#FE FENCE,CL/12 FENCE,BW/1 #FE PAVE,ASP/GD OTHER IMPROVEMENTS AND FEATURES									290500	0		58100	
#14 WELDED STEEL STG TANK W/CONE ROOF TNK #103 3,150,000 GAL VERT #FE TNK1													
#15 WELDED STEEL STG TANK 2,1000,000 GAL UNL GASOLINE TANK #104 #FE TNK1 OTHER IMPROVEMENTS AND FEATURES									46600	0		9320	
#16 WELDED STEEL STG TANK TANK #105 2,1000,000 GAL UNL GASOLINE #FE TNK1													
----- CONTINUE -----													
BY _____													
VALUATION BY BOARD OF EQUALIZATION 1 PRICHARD VALUATION 2 OTTOMELLE VALUATION 3 CHICKASAW VALUATION 4 MOBILE VALUATION 5 BAYOU LA BATRE VALUATION 6 SARALAND VALUATION 7 SATSAMA VALUATION 8 DAUPHIN ISLAND VALUATION 9 MT VERNON VALUATION TOTAL ASSESSED VALUE													

(IF NOT HIS OWN PROPERTY HE MUST STATE THE CAPACITY IN WHICH HE RETURNS SUCH PROPERTY FOR ASSESSMENT)  
IS A FULL AND COMPLETE RETURN OF ALL PROPERTY OWNED BY  
(HERE STATE ME IF THE PROPERTY RETURNED IS HIS OWN PROPERTY AND IF NOT HIS OWN)

(PROPERTY, STATE THE NAME OF THE PERSON, CORPORATION OR ESTATE FOR WHOM THE PROPERTY IS RETURNED)

OR IN WHICH (HERE DESIGNATE THE OWNER FOR WHOM THE RETURN IS MADE)

HAD INTEREST WHATEVER THE STATUS OF WHICH FOR TAXATION, OR EXEMPTION FROM TAXATION, IS IN THIS COUNTY, ON THE FIRST OF OCTOBER OF THE PRESENT YEAR, AND OF THE IMPROVEMENTS ON LANDS LISTED IN THE FOREGOING SCHEDULE SO HELP ME GOD, ALSO, I DO HEREBY SOLEMNLY SWEAR (OR AFFIRM) THAT I AM HEAD OF THE FAMILY AND/OR THAT NO OTHER CLAIM OR EXEMPTION FROM STATE TAXES FOR HOMESTEAD HAS BEEN MADE OR FILED BY OR ON BEHALF OF ANY MEMBER OF MY IMMEDIATE HOUSEHOLD AND THAT THE ITEMS OF THIS ASSESSMENT MARKED IS THE HOMESTEAD CLAIMED BY ME WHICH DOES NOT EXCEED \$2000.00 IN ASSESSED VALUE NOR 100 ACRES IN AREA. I UNDERSTAND THAT THIS ASSESSMENT RETURN IS BEING MADE AS OF OCTOBER 1 OF THE PRESENT YEAR AND THAT IF THIS RETURN IS SIGNED BEFORE SAID DATE, I AM REQUIRED BY LAW TO REPORT ANY CHANGE AFFECTING VALUE OF EXEMPTION CLAIMS WHICH OCCURS BETWEEN THE DATE OF SIGNING AND SAID OCTOBER 1, OF THE PRESENT YEAR.

SIGN

HERE X

SUBSCRIBED AND SWORN TO BEFORE ME

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WILL BE 65 YEARS OF AGE BEFORE THE DATE COVERED BY THIS ASSESSMENT

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WAS PERMANENTLY OR TOTALLY DISABLED BEFORE THE DATE COVERED BY THIS ASSESSMENT

SIGN

HERE X

THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 20 \_\_\_\_\_

I HEREBY CERTIFY THAT BEFORE TAKING THE FOREGOING ASSESSMENT LIST I ADMINISTERED THE OATH REQUIRED TO BE ADMINISTERED UNDER PARAGRAPH 40 OF TITLE 51 OF THE 1940 CODE OF ALABAMA AS AMENDED TO TAXPAYER OR AGENT, MAKING THIS RETURN AND THAT I INTERROGATED THE SAID PARTY AS THE LAW DIRECTS IN REGARD TO THE SAME.

MARILYN E. WOOD  
REVENUE COMMISSIONER MOBILE COUNTY

KEY 1240552  
STA113 TC

No. H					
TA					
1	2	3	4	5	

LOC:

COUNTY	TWP	AREA	SEC	1/4 SEC.	BLOCK	PARCEL	CLASS
02	38	01	38	0	000	030.	2

Exemption Valuation	Market Value	Employer's Estimate of Value	Assessor's Value For Assessment	Valuation By Board Of Equalization
------------------------	-----------------	------------------------------------	---------------------------------------	--

BY

	REAL ESTATE DESCRIPTION	(NOTE WHETHER MINERAL RIGHT, SURFACE RIGHT, TIMBER RIGHT, TURPENTINE RIGHT OR OTHER RIGHT)

## OTHER IMPROVEMENTS AND FEATURES

#17 WELDED STEEL STG TANK      TANK #106 2,1000,000 GAL  
REFORMATE

HFE TNK1

## OTHER IMPROVEMENTS AND FEATURES

#18 WELDED STEEL STGE TANK TANK #107 4,2000,000 GAL  
DIESEL

#FE TNK1

### OTHER IMPROVEMENTS AND FEATURES

#19 WELDED STEEL STG TANK TANK #108 4,200,000 GAL  
N & K (TR)

#FE TNK1

### OTHER IMPROVEMENTS AND FEATURES

#20 WELDED STEEL STG TANK TANK #109 2,310,000 GAL  
CONDENSATE

#FE TNK1

### OTHER IMPROVEMENTS AND FEATURES

----- CONTINUE -----

[illegible]



LIST OF PROPERTY RETURNED BY  
2007  
060707 POST OFFICE ADDRESS

HAMILTON BOULEVARD LLC  
3800 SOLLIE RD  
MOBILE AL 36695

**Mailing Add** \_\_\_\_\_ :

KEY 1240552  
STA113 TC

No. H

ТА				
1	2	3	4	5

GAMXX ENERGY INC

TS 1991

LOC:

COUNTY	TWP.	AREA	SEC.	1/4 SEC.	BLOCK	PARCEL	CLASS	Market Value	Taxpayer's Estimate of Value	MUN. CODE	Tax Assessor's Value For Assessment	Valuation By Board Of Equalization
02	38	01	38	0	000	030.	2					

I DO SOLEMNLY SWEAR (OR AFFIRM) THAT THE FOREGOING LIST  
OF PROPERTY RETURNED BY

IF NOT HIS OWN PROPERTY HERE STATE THE CAPACITY IN WHICH HE RETURNS SUCH PROPERTY FOR ASSESSMENT  
IS A FULL AND COMPLETE RETURN OF ALL PROPERTY OWNED BY  
HERE STATE IF THE PROPERTY RETURNED IS HIS OWN PROPERTY AND IF NOT HIS OWN

(PROPERTY, STATE THE NAME OF THE PERSON, CORPORATION OR ESTATE FOR WHOM THE PROPERTY IS RETURNED)

OR IN WHICH \_\_\_\_\_  
(HERE DESIGNATE THE OWNER FOR WHOM THE RETURN IS MADE)

HAD INTEREST WHATEVER, THE SITUUS OF WHICH FOR TAXATION, OR EXEMPTION FROM TAXATION, IS IN THIS COUNTY, ON THE FIRST OF OCTOBER OF THE PRESENT YEAR, AND OF THE IMPROVEMENTS ON LANDS LISTED IN THE FOREGOING SCHEDULE SO HELP ME GOD, ALSO, I DO HEREBY SOLEMNLY SWEAR (OR AFFIRM THAT I AM AHEAD OF THE FAITH) THAT THE TAXES THAT I HAVE HEREIN DECLARED TO BE PAID BY ME, OR BY MY HOMESTEAD HAS BEEN MADE OR FILED BY OR ON BEHALF OF ANY MEMBER OF MY IMMEDIATE HOUSEHOLD AND THAT THE ITEMS OF THIS ASSESSMENT MARKED IN THE HOMESTEAD, CLAIMED BY ME WHICH DOES NOT EXCEED \$2000 OF ASSESSED VALUE, ARE NOT PAID BY ME, OR BY MY IMMEDIATE HOUSEHOLD, AND THAT I WILL RETURN AS OF OCTOBER 1 OF THE PRESENT YEAR, AND THAT IF THIS RETURN IS SIGNED BEFORE SAID DATE, I AM REQUIRED BY LAW TO REPORT ANY CHANGE AFFECTING THE VALUE OF THE PROPERTY HEREIN DECLARED TO OCCUR BETWEEN THE DATE OF SIGNING AND SAID DATE, OF THE PRESENT YEAR.

## SIGN

HERE X

SUBSCRIBED AND SWORN TO BEFORE ME

I FURTHER SWEAR ( OR AFFIRM) THAT I AM OR WILL BE 65 YEARS OF AGE

**BEFORE THE DATE COVERED BY THIS ASSESSMENT**

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WAS PERMANENTLY OR  
TOTALLY DISABLED BEFORE THE DATE COVERED BY THIS ASSESSMENT

## SIGN

**HERE X**

THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 20\_\_\_\_

I HEREBY CERTIFY THAT BEFORE TAKING THE FOREGOING ASSESSMENT LIST I ADMINISTERED THE OATH REQUIRED TO BE ADMINISTERED UNDER PARAGRAPH 40 OF TITLE 51 OF THE 1940 CODE OF ALABAMA AS AMENDED TO TAXPAYER OR AGENT, MAKING THIS RETURN AND THAT I INTERROGATED THE SAID PARTY AS THE LAW DIRECTS IN REGARD TO THE SAME

MARILYN E. WOOD  
REVENUE COMMISSIONER MOBILE COUNTY

No.	REAL ESTATE DESCRIPTION	NOTE WHETHER MINERAL RIGHT, SURFACE RIGHT, TIMBER RIGHT, TURPENTINE RIGHT OR OTHER RIGHT

#21 WELDED STEEL STGE	TANK #110	2,310,000 GAL
-----------------------	-----------	---------------

COND NAPHTHA

#FF TNK1

## OTHER IMPROVEMENTS AND FEATURES

#22 WELDED STEEL STGE	TANK #111 2,310,000 GAL
-----------------------	-------------------------

GASOLINE

#FF TNK1

### OTHER IMPROVEMENTS AND FEATURES

#23 WELDED STEEL STGE	TANK #112 2,310,000 GAL
-----------------------	-------------------------

GASOLINE

#FE TNK1

## OTHER IMPROVEMENTS AND FEATURES

#24 WELDED STEEL STGE TANK #201 2,100,000 GAL RFO

#FE TNK1

### OTHER IMPROVEMENTS AND FEATURES

#25 WELDED STEEL STG	TANK 202 W/CONE ROOF
----------------------	----------------------

1.575.000 GAL R F O

CONTINUE

[illegible]

060707 POST OFFICE ADDRESS

**Mailing Add \_\_\_\_\_ :**

2007  
P  
A

KEY 124055Z  
STA113 TC

No. 4

TA				
1	2	3	4	5

GAMXX ENERGY INC

TS 1991

LOC:

COUNTY	TWP.	AREA	SEC.	1/4 SEC.	BLOCK	PARCEL	CLASS
02	38	01	38	0	000	030.	2

I DO SOLEMNLY SWEAR (OR AFFIRM) THAT THE FOREGOING LIST  
OF PROPERTY RETURNED BY

	H'slead Exemption Valuation
--	-----------------------------------

**Market Value**

	Taxpayer's Estimate of Value
--	------------------------------------

MUN  
C-

**Tax Assessor's  
Value For  
Assessment**

Valuation By  
Board  
Of Equalization

REAL ESTATE DESCRIPTION	NOTE WHETHER MINERAL RIGHT, SURFACE RIGHT, TIMBER RIGHT, TURPENTINE RIGHT OR OTHER RIGHT

#FE TNK1

#26 TNK202 (NO VALUE)

HF E TNK1

#27 WELDED STEEL STGE	TANK #203 3,150,000 GAL
-----------------------	-------------------------

#FE TNK1

#28 TANK 203 (NO VALUE)

#FE TNK 1

#29 WELDED STEEL STGE	TANK #301 1,050,000 GAL RFO
-----------------------	-----------------------------

HF E TNK 1

#30 TANK 301 (NO VALUE)

#FE TNK1

## OTHER IMPROVEMENTS AND FEATURES

#31 WELDED STEEL STG TANK #302 W/CONE ROOF  
1,050,000 GAL TURBINE FUEL

----- CONTINUE -----

IF NOT HIS OWN PROPERTY HERE STATE THE CAPACITY IN WHICH HE RETURNS SUCH PROPERTY FOR ASSESSMENT.  
IS A FULL AND COMPLETE RETURN OF ALL PROPERTY OWNED BY  
(HERE STATE IF THE PROPERTY RETURNED IS HIS OWN PROPERTY AND IF NOT HIS OWN)

(PROPERTY STATE THE NAME OF THE PERSON, CORPORATION OR ESTATE FOR WHOM THE PROPERTY IS RETURNED)

OR IN WHICH

THE RE DESIGNATE THE OWNER FOR WHOM THE RETURN IS MADE

HAD INTEREST WHATSOEVER, THE SITUS OF WHICH FOR TAXATION, OR EXEMPTION FROM TAXATION, IS IN THIS COUNTY, ON THE FIRST OF OCTOBER OF THE PRESENT YEAR, AND OF THE IMPROVEMENTS ON LANDS LISTED IN THE FOREGOING SCHEDULE, TO HELP MEEN TO GOD AS I DO HEREBY SOLEMNLY SWEAR OR AFFIRM THAT I AM HEAD OF THE FAMILY OF THE SAID DECEASED, AND THAT THE SAID DECEASED WAS THE HEAD OF THE SAID HOMESTEAD HAS BEEN MADE OF FILED BY OR ON BEHALF OF ANY MEMBER OF MY IMMEDIATE HOUSEHOLD AND THAT THE ITEMS OF THIS ASSESSMENT MARKED IS THE PROPERTY OF THE SAID DECEASED, AND THAT THE SAID DECEASED WAS NOT A MEMBER OF HIS OR HER 160 ACRES IN AREA. I UNDERSTAND THAT THIS ASSESSMENT RETURN IS BEING MADE FOR THE FIRST OF OCTOBER OF THE PRESENT YEAR AND THAT IF THIS RETURN IS SIGNED AFTER BEING SAID DATE, I AM REQUIRED BY LAW TO REPORT ANY CHANGE AFFECTING THE SAME, AND THAT ANY SUCH CHANGE MUST BE REPORTED TO THE DATE OF SIGNING AND TO THE DATE OF THE PRESENT YEAR.

## SIGN

HERE X

SUBSCRIBED AND SWORN TO BEFORE ME

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WILL BE 65 YEARS OF AGE

BEFORE THE DATE COVERED BY THIS ASSESSMENT

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WAS PERMANENTLY OR TOTALLY DISABLED BEFORE THE DATE COVERED BY THIS ASSESSMENT

## SIGN

HERE X

THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 20\_\_\_\_

I HEREBY CERTIFY THAT BEFORE TAKING THE FOREGOING ASSESSMENT LIST I ADMINISTERED THE OATH REQUIRED TO BE ADMINISTERED UNDER PARAGRAPH 40 OF TITLE 51 OF THE 1940 CODE OF ALABAMA AS AMENDED TO TAXPAYER OR AGENT, MAKING THIS RETURN AND THAT I INTERROGATED THE SAID PARTY AS THE LAW DIRECTS IN REGARD TO THE SAME

MARILYN E. WOOD  
REVENUE COMMISSIONER MOBILE COUNTY

BY

2007 **Tax Return List Real and Personal Property - Mobile County, AL - 2007**  
LIST OF PROPERTY RETURNED BY HAMILTON BOULEVARD LLC  
2007 3800 SOLLIE RD  
060707 POST OFFICE ADDRESS MOBILE AL 36695

Mailing Add \_\_\_\_\_ : A

KEY 1240552  
STA113 TC

No. H						
TA	1	2	3	4	5	6

PROPERTY LAST ASSESSED TO WHOM

GAMXX ENERGY INC

TS 1991

LOC:

OATH TO BE ADMINISTERED TO TAXPAYER:

I DO SOLEMNLY SWEAR (OR AFFIRM) THAT THE FOREGOING LIST OF PROPERTY RETURNED BY

IF NOT HIS OWN PROPERTY HERE STATE THE CAPACITY IN WHICH HE RETURNS SUCH PROPERTY FOR ASSESSMENT  
IS A FULL AND COMPLETE RETURN OF ALL PROPERTY OWNED BY  
HERE STATE ME IF THE PROPERTY RETURNED IS HIS OWN PROPERTY AND IF NOT HIS OWN

(PROPERTY, STATE THE NAME OF THE PERSON, CORPORATION OR ESTATE FOR WHOM THE PROPERTY IS RETURNED)

OR IN WHICH

(HERE DESIGNATE THE OWNER FOR WHOM THE RETURN IS MADE)

HAD INTEREST WHATEVER, THE SITUS OF WHICH FOR TAXATION, OR EXEMPTION FROM TAXATION, IS IN THIS COUNTY, ON THE FIRST OF OCTOBER OF THE PRESENT YEAR, AND OF THE IMPROVEMENTS ON LANDS LISTED IN THE FOREGOING SCHEDULE SO HELP ME GOD, ALSO, I DO HEREBY SOLEMNLY SWEAR (OR AFFIRM) THAT I AM HEAD OF THE FAMILY AND/OR THAT NO OTHER CLAIM, OR EXEMPTION FROM STATE TAXES FOR HOMESTEAD HAS BEEN MADE OR FILED BY OR ON BEHALF OF ANY MEMBER OF MY IMMEDIATE HOUSEHOLD AND THAT THE ITEMS OF THIS ASSESSMENT MARKED IS THE HOMESTEAD CLAIMED BY ME WHICH DOES NOT EXCEED \$2000.00 IN ASSESSED VALUE NOR 100 ACRES IN AREA, I UNDERSTAND THAT THIS ASSESSMENT RETURN IS BEING MADE AS OF OCTOBER 1 OF THE PRESENT YEAR AND THAT IF THIS RETURN IS SIGNED BEFORE SAID DATE, I AM REQUIRED BY LAW TO REPORT ANY CHANGE AFFECTING VALUE OF EXEMPTION CLAIMS WHICH OCCURS BETWEEN THE DATE OF SIGNING AND SAID OCTOBER 1 OF THE PRESENT YEAR.

SIGN

HERE X

SUBSCRIBED AND SWORN TO BEFORE ME

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WILL BE 65 YEARS OF AGE

BEFORE THE DATE COVERED BY THIS ASSESSMENT

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WAS PERMANENTLY OR TOTALLY DISABLED BEFORE THE DATE COVERED BY THIS ASSESSMENT

SIGN

HERE X

THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 20\_\_\_\_

I HEREBY CERTIFY THAT BEFORE TAKING THE FOREGOING ASSESSMENT LIST I ADMINISTERED THE OATH REQUIRED TO BE ADMINISTERED UNDER PARAGRAPH 40 OF TITLE 51 OF THE 1940 CODE OF ALABAMA AS AMENDED TO TAXPAYER OR AGENT, MAKING THIS RETURN AND THAT I INTERROGATED THE SAID PARTY AS THE LAW DIRECTS IN REGARD TO THE SAME.

MARILYN E. WOOD  
REVENUE COMMISSIONER MOBILE COUNTY

BY \_\_\_\_\_

COUNTY	TWP.	AREA	SEC.	1/4 SEC.	BLOCK	PARCEL	CLASS	H'stead Exemption Valuation	Market Value	Taxpayer's Estimate of Value	MUN C O D E	Tax Assessor's Value For Assessment	Valuation By Board Of Equalization
02	38	01	38	0	000	030.	2						
REAL ESTATE DESCRIPTION (NOTE WHETHER MINERAL RIGHT, SURFACE RIGHT, TIMBER RIGHT, TURPENTINE RIGHT OR OTHER RIGHT)													
#FE TNK1 OTHER IMPROVEMENTS AND FEATURES									79300		0	15860	
#32 WELDED STEEL STGE TANK #401 W/CONE ROOF 1,050,000 GAL DIESEL #FE TNK1													
#33 WELDED STEEL STGE TANK #402 FLOATING TOP 3,570,000 GAL CRUDE #FE TNK1													
#34 WELDED STEEL STGE TANK #402 FLOATING TOP 3,570,000 GAL CRUDE #FE TNK1													
#35 WELDED STEEL STGE TANK #601 W/CONE ROOF 1,386,000 GAL LSR (UT) #FE TNK1													
#36 TANK #601 (NO VALUE) #FE TNK1													
----- CONTINUE -----													
								</					

## 2007

HAMILTON BOULEVARD LLC  
3800 SOLLIE RD  
MOBILE AL 36695

**Mailing Add \_\_\_\_\_ :**

KEY 1240552  
STA113 TC

No. H					
TA					
1	2	3	4	5	6

GAMXX ENERGY INC

TS 1991

LOC:

COUNTY	TWP.	AREA	SEC.	1/4 SEC	BLOCK	PARCEL	CLASS
--------	------	------	------	---------	-------	--------	-------

<p>H'slead Exemption Valuation</p>	
--	--

Market Value

Taxpayer's  
Estimate  
of Value

MUN	DOC
-----	-----

**Tax Assessor's  
Value For  
Assessment**

Valuation By  
Board  
Of Equalization

117 AND HIS OWN PROPERTY HERE STATE THE CAPACITY IN WHICH HE RETURNS SUCH PROPERTY FOR ASSESSMENT.  
IS A FULL AND COMPLETE RETURN OF ALL PROPERTY OWNED BY  
(HERE STATE IF THE PROPERTY RETURNED IS HIS OWN PROPERTY AND IF NOT HIS OWN)

PROPERTY. STATE THE NAME OF THE PERSON, CORPORATION OR ESTATE FOR WHOM THE PROPERTY IS RETURNED.

OR IN WHICH

HERE DESIGNATE THE OWNER FOR WHOM THE RETURN IS MADE

HAD INTEREST WHATSOEVER, THE SITUS OF WHICH FOR TAXATION, OR EXEMPTION FROM TAXATION, IS IN THIS COUNTY, ON THE FIRST OF OCTOBER OF THE PRESENT YEAR, AND THAT THE IMPROVEMENTS ON LANDS LISTED IN THE FOREGOING SCHEDULE SO HELP ME, GOD, ALSO, DO HEREBY SOLEMNLY SWEAR OR AFFIRM THAT I AM HEAD OF THE FAMILY OF THE HOMEOWNER, AND THAT THE RETURN HEREIN IS MADE BY ME OR BY AN AGENT, IF A HOMESTEAD HAS BEEN MADE OR FILED BY OR ON BEHALF OF ANY MEMBER OF MY IMMEDIATE HOUSEHOLD AND THAT THE ITEMS OF THIS ASSESSMENT MARKED IS THEREIN HOMESTEAD CLAIMED BY ME WHICH DOES NOT EXCEED \$2000.00 IN ASSESSED VALUE, AND THAT THE RETURN HEREIN IS MADE IN ACCORDANCE WITH THE REQUIREMENTS OF AS OF OCTOBER 1 OF THE PRESENT YEAR AND THAT IF THIS RETURN IS SIGNED BEFORE SAID DATE I AM REQUIRED BY LAW TO REPORT ANY CHANGE AFFECTING THE VALUE OF THE PROPERTY HEREIN, WHICH OCCURS BETWEEN THE DATE OF SIGNING AND SAID DATE OF THE PRESENT YEAR.

## SIGN

HERE X

SUBSCRIBED AND SWORN TO BEFORE ME

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WILL BE 65 YEARS OF AGE

BEFORE THE DATE COVERED BY THIS ASSESSMENT

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WAS PERMANENTLY OR TOTALLY DISABLED BEFORE THE DATE COVERED BY THIS ASSESSMENT

## SIGN

HERE X

THIS DAY OF 20

I HEREBY CERTIFY THAT BEFORE TAKING THE FOREGOING ASSESSMENT LIST I ADMINISTERED THE OATH REQUIRED TO BE ADMINISTERED UNDER PARAGRAPH 40 OF TITLE 51 OF THE 1940 CODE OF ALABAMA AS AMENDED TO TAXPAYER OR AGENT, MAKING THIS RETURN AND THAT I INTERROGATED THE SAID PARTY AS THE LAW DIRECTS IN REGARD TO THE SAME

MARILYN E WOOD  
REVENUE COMMISSIONER MOBILE COUNTY

BY

[illegible]

KEY 124055Z  
STA113 TC

TA				
1	2	3	4	5

LOC:

	H'stead
--	---------

Exemption	Valuation
-----------	-----------

1

1

1

1

1

1

1

1

1

1

1

1

ASSESSED VALUE



No. H					
ТА					
1	2	3	4	5	6

[illegible]

KEY 124055Z  
STA113 TC

TA				
1	2	3	4	5

LOC:

H'stead Exemption Valuation	Market Value	Taxpayer's Estimate of Value	MUN C O D E	Tax Assessor's Value For Assessment	Valuation By Board Of Equalization
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FEAT  
BLOG

1135900  
478600

COUNTY

RPRK 5854 PAGE 1874 DATED 2005/10/03 TD

(HERE DESIGNATE THE OWNER FOR WHOM THE RETURN IS MADE)

## SIGN

HERE X

SUBSCRIBED AND SWORN TO BEFORE ME

I FURTHER SWEAR ( OR AFFIRM) THAT I AM OR WILL BE 65 YEARS OF AGE  
BEFORE THE DATE COVERED BY THIS ASSESSMENT

I FURTHER SWEAR (OR AFFIRM) THAT I AM OR WAS PERMANENTLY OR  
TOTALLY DISABLED BEFORE THE DATE COVERED BY THIS ASSESSMENT

## SIGN

**HERE X**

THIS                      DAY OF                      20

I HEREBY CERTIFY THAT BEFORE TAKING THE FOREGOING ASSESSMENT LIST I ADMINISTERED THE OATH REQUIRED TO BE ADMINISTERED UNDER PARAGRAPH 40 OF TITLE 31 OF THE 1940 CODE OF ALABAMA AS AMENDED TO TAXPAYER OR AGENT, MAKING THIS RETURN AND THAT I INTERROGATED THE SAID PARTY AS THE LAW DIRECTS IN REGARD TO THE SAME

MARILYN E WOOD  
REVENUE COMMISSIONER MOBILE COUNTY

SALES PRICE: \$

VERIFIED WITH:

### COST APPROACH

3316500

663300

TO ASSESS CL II PPTY TP REPTS VANDALISM TO ALL BUILDINGS

[illegible]

# REFERENCE

6

# McDOWELL KNIGHT

McDOWELL KNIGHT ROEDDER & SLEDGE L.L.C.  
LAWYERS

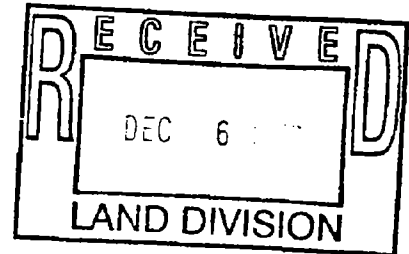
J. STEPHEN HARVEY

Direct Dial: 251-431-8819  
sharvey@mcdowellknight.com

December 5, 2006

## FEDERAL EXPRESS

Alabama Department of Environmental Management  
Attention: Mr. Antoine Parker  
Environmental Services Branch - Land Division  
1400 Coliseum Blvd.  
Montgomery, AL 36110-2059



Re: Former Gamxx Oil Refinery site  
4000 Hamilton Boulevard, Theodore, Mobile County, Alabama  
ALRERA# 461-9415

Dear Mr. Parker:

Our firm represents Hamilton Blvd., LLC, the owner of the above site ("Hamilton"). This letter is sent pursuant to our phone conversations 2-3 weeks ago regarding the above. I enclose reports, contractor disposal manifests and other documentation from Analytical Chemical Testing Laboratory, Inc. ("ACT") showing the cleanup activities that have been performed thus far on the above site pursuant to the 6/20/06 Remedial Action Plan previously submitted by Hamilton and ACT. Please review the enclosed to confirm the cleanup has been properly performed. If you have any questions or comments, please contact me at the above phone number. My client would like for all comments/questions to go to me directly, rather than to ACT.

As we discussed, the previously submitted 6/20/06 plan did not address ground water or soil contamination. That will need to be addressed through a subsequent plan. In addition, the 6/20/06 plan referenced certain potential asbestos-containing materials. We are currently working on an asbestos survey of the property and will forward that to you later.

Very truly yours,

J. Stephen Harvey  
For the Firm

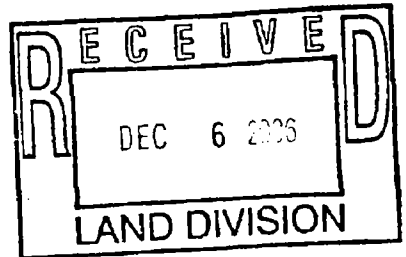
JSH/al  
M:190697  
Enclosures

cc: Mr. R. E. Myles  
Mr. Chuck Byrum  
by email, w/o enclosures



ANALYTICAL CHEMICAL TESTING  
LABORATORY, INC.

*Consulting Chemists, Scientists & Engineers*



REMEDIATION ACTION PLAN  
IMPLEMENTATION

FORMER GAMXX ENERGY/MARION OIL COMPANY

4000 Hamilton Blvd.  
Theodore, Alabama

GULF SERVICES CORPORATION  
5535 Business Parkway  
Theodore, Alabama 36582

JOB# 06-2802

November 3, 2006





ANALYTICAL CHEMICAL TESTING  
LABORATORY, INC.

*Consulting Chemists, Scientists & Engineers*

November 3, 2006

REPOTR TO: Gulf Services Corporation  
5535 Business Pkwy  
Theodore, AL 36582

REPORT OF: Implementation of Remediation Action Plan (RAP)  
Site: Former GAMXX Energy Hamilton Blvd/Rangeline Theodore, AL  
Generator: Gulf Services/Hamilton Blvd., L.L.C.

JOB NUMBER 06-2802

ATTENTION: Mr. John Ramsey, President  
Mr. Steve Harvey, Esquire

-----  
Analytical Chemical Testing Laboratory, Inc. has completed and implemented the chemical/drum portion of the January 26, 2006 Remediation Action Plan (RAP) at the above listed site. The Plan was approved by ADEM and consisted of actions in accordance with the proposed scope of work.

WORK SCOPE OF REMEDIATION ACTION PLAN  
-----

ACT originally proposed to engage and supervise personnel and equipment to drain/flush, pump, containerize, label, haul, and dispose of oil from 16 electrical capacitors (PCB-containing) and 3 transformers (low level PCB's <50 p.p.m). Further location/identification of 10 more PCB-containing transformers and 1 more transformer resulted during project commencement and were also handled in the same manner as the original units.  
(total: 26 capacitors & 4 transformers)

ACT proposed to provide personnel and equipment necessary to containerize, label, haul, and dispose of approximately 700 lab chemicals and jet-fuel sample containers that were previously grouped and inventoried from the on-site lab and sample storage room by ACT.

ACT proposed to provide personnel and equipment to containerize, load, haul, and dispose of 188 55-gallon drums of solids/liquids from the warehouse previously identified by inventory. Of the 188 drums, 165 contained solid, non-hazardous materials, and 23 drums (including 2 floor sweepings drums) that consisted of hazardous components (based on prior testing).

Asbestos-Containing Building Materials (ACBM) were previously identified on-site. Although ACBM was addressed in the original Remediation Action Plan, a site survey has been proposed but has not been performed. It was ACT's understanding that the ACBM work will commence after this portion of this

Gulf Services Corporation

November 3, 2006

Page 2

#### WORK SCOPE (con't)

project is complete. The ACBM work will be performed by qualified personnel when authorization has been given to perform the survey and identify all ACBM on-site. Once identified, a removal scope can be written.

The following portions of the original RAP has been completed as follow:

#### PCB CAPACITORS & TRANSFORMERS

Oil Recovery, Inc., drained, flushed, and containerized oil from 26 PCB-containing oil (>500 p.p.m.) capacitors, and from 4 Transformers with PCB-contaminated oil (<50 p.p.m.) at the facility. Contents and flushings were pumped into approved containers/drums, labeled, transported and disposed of at Clean Harbor Facility in Tucker, GA. Original numbers identified in the RAP were 16 Capacitors & 3 Transformers. However, ten additional Capacitors were found during the project and they were added to this project as well as one additional Transformer. Each of the involved Transformers and Capacitors were tagged to identify those that were cleaned. Transformers still exist on-site, as well as capacitors, but none contain PCB's. Based on our site inspection, no other PCB-Contaminated Transformers or PCB-Containing Capacitors were identified on the site at this time. Disposal manifests are attached in the Appendix.

Oil Recovery, Inc., also pumped out jet fuel sample containers and petroleum drums (lube oil & hydraulic). These were pumped into a vacuum truck, and transported and recycled at their Mobile, AL facility. Disposal manifests are attached in the Appendix.

These units were the only ones identified on-site that were found to contain PCB's at any level, and after this work was performed, no other transformers or capacitors were found to exist on-site that contain PCB's. No further threat of PCB-containing or contaminated oil exists for this site.

#### LABORATORY CHEMICALS

Southern Logistics, Inc., personnel prepared for disposal approximately 700 reagents, chemicals, and liquid and small quantities of solid materials found in the on-site laboratory. These items were stabilized in sealed containers, Lab-Paked, and prepared for disposal at Clean Harbor, LLC, Reidsville, NC. Wastes were grouped, codes were assigned, and the materials were manifested and transported by STAT, Inc. Disposal manifests are attached in the Appendix.

Jet-fuel and petroleum sample containers were identified by previous inventory in the lab storage room, and were poured in a container and were pumped into a vacuum truck for disposal/recycle by Oil Recovery, Inc., Mobile, AL. Disposal manifests are attached in the appendix.



Gulf Services Corporation  
November 3, 2006  
Page 3

WAREHOUSED DRUMS 55 GAL  
-----

Southern Logistics, Inc.

Tasks: Group and containerize/label twenty-one (21) drums of liquids, solids, solvents, and two (2) drums of floor sweepings in the warehouse labeled and hauled by STAT, Inc. for disposal at Clean Harbor, Reidsville, NC. Disposal manifests are found in the Appendix.

Southern Logistics, Inc.

Tasks: HAZ-Survey other site buildings gather shop containers, <1 gal containers of oil, flammables, jet/diesel fuel, lube oil, batteries, gas cylinders, bags of activated carbon, cleaners, approx. 25 fire extinguishers, (some in other bldgs), cleaners, anti-seize compounds.

The additional items were not part of the original scope of this RAP but when authorized, will be handled in the same manner as in this plan and follow-up documentation and disposal manifests will be forwarded.

Gulf Services, Inc.

Tasks: Grouped and containerize 165 one hundred sixty five (165) drums of non-hazardous spent catalyst beads, sulfur, balls, and solids were loaded and hauled by Manning Trucking of Pascagoula, MS for disposal at MacLand Disposal Center, Moss Point, MS. Disposal manifests are found in the Appendix.

PROJECT COORDINATION  
-----

ACT LAB, Inc.

Tasks: Authored the Remediation Action Plan and supervised it's implementation. Performed Project Management, Directed Site Safety, Served as Generator's Agent, and Coordinated work performed by each company involved. Coordinated with ADEM at start and finish.

ACT LAB, Inc.

Tasks: Inventoried 142 additional items, found in HAZ-survey, profiled and prepared a cost proposal for subsequent disposal. Will provide documentation and disposal manifests when work is complete.



# REFERENCE

7

**PRELIMINARY ASSESSMENT**  
**AAI-GAMXX**  
**THEODORE, MOBILE COUNTY, ALABAMA**  
**EPA ID No.: ALD 095697058**  
**CERCLIS SITE REF. No. 6671**

*Prepared By*  
*Bonnie L. Temple*  
*Alabama Department of Environmental Management*  
*Land Division - Hazardous Waste Branch*  
*Site Assessment Unit*

## 2.2 Site Description

There is 145 acres to the GAMXX site, but approximately 87 acres (estimate 60%) consist of the working facility (Att. 3-6). The remainder appears to be grass or woods. The entire facility is fenced mostly with an 8-foot chainlink fence, but a small portion of the fence is only 6-foot high. Vandalism has occurred at the site; therefore, the site is considered accessible to the public. There appears to be a ditch flowing from the west, between Areas B/C, south of the flare, north of the LPG storage tanks and eastward under Rangeline Road (Fig. 1-2; Att. 3-4). The property is generally flat with numerous dikes surrounding the storage tanks.

The only homes located in the immediate area lie 0.1 mile east of the GAMXX entrance along Hamilton Boulevard (Fig. 1-2; Att. 1, 3-4). The remainder of structures on the topographic map appears to be businesses.

## 2.3 Waste Characteristics and Site History

This site was originally Alabama Refining Company, Inc. with records indicating that construction was in progress as of December 14, 1963 (Att. 9-11). The second company known to operate onsite was Marion Corporation (Marion Refining Company, Marion Corporation – Refining Operations) which operated from 1967 until 1983. An additional 90 acres was added to the original acreage in October 17, 1973. Marion started its north Mobile County tank farm (Seabury Station) in April 1976. The Marion facility was shut down indefinitely, and Marion declared Chapter 11 Bankruptcy in 1983.

GAMXX Energy, Inc. entered into a lease/purchase agreement for the site in May 16, 1985. Alexander Allen, Inc. bought GAMXX Energy, Inc. in 1987. Ernest B. Hardy is the current owner and operator (Att. 3, 9-11). The name was changed to AAI-GAMXX, but most of the permits still are under the GAMXX Energy, Inc. name. The refinery was started up again in June 1987. At this point there is discrepancy as to when the actual shutdown occurred. Information indicated that the refinery might have been shut down in July 1989 (Att. 9-10). It is said that the facility operated for less than 24 hours in 1989 then was shut down (Att. 3). Other information indicated that “the process units were last used in December 1990 to give a three-day demonstration...for the Department of Defense” (Att. 12). According to the SARA Title III records, the official name for GAMXX is Theodore Refinery of Alexander-Allen, Inc. (Att. 13). At present Mr. Tom Payne is the only part-time employee at the facility. Information requested from Mr. Hardy was not available at the time preliminary assessment was written (Att. 6).

There are no monitoring wells at GAMXX, but there are two processing wells (Att. 3). There are no Underground Storage Tanks (USTs) onsite now, but many Aboveground Storage Tanks (ASTs; Table 1). An 8,000 gallon unleaded regular gasoline UST was removed in 1990. From the records the older ASTs sit directly on a layer of clay, but it is not known if the entire floor is clay or just under the tanks (See Table 1; Att. 3, 9-10). The newer tanks sit on a concrete ring plus a clay bottom. Some of these tanks also have an additional asphalt layer under the tank. Clay dikes surround the storage tanks on earthen/clay floors, and the dikes surround either individual tanks or groups of tanks. Inside the dikes stormwater flows through valves in the dike, along the drainage pipes, and enters the centralized, concrete, oil-water API separator/ditch system (Fig. 2-4).

# REFERENCE

8



# SECURITIES AND EXCHANGE COMMISSION

WASHINGTON, D.C. 20549

## FORM 10-K

☒ ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE  
SECURITIES EXCHANGE ACT OF 1934

For the fiscal year ended September 30, 2005

OR

☐ TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF  
THE SECURITIES EXCHANGE ACT OF 1934

For the transition period from \_\_\_\_\_ to \_\_\_\_\_

Commission file number: 0-10990

### CASTLE ENERGY CORPORATION

(Exact name of registrant as specified in its charter)

Delaware

(State or other jurisdiction of  
incorporation or organization)

76-0035225

(I.R.S. Employer  
Identification Number)

357 South Gulph Road, Suite 260  
King of Prussia, Pennsylvania  
(Address of principal executive offices)

19406  
(Zip Code)

Registrant's telephone number:

(610) 992-9900

Securities registered pursuant to Section 12(b) of the Act: None

Securities registered pursuant to Section 12(g) of the Act: Common Stock — \$.50 par value

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days. Yes ☒ No ☐

Indicate by check mark if disclosure of delinquent filers pursuant to Item 405 of Regulation S-K is not contained herein, and will not be contained, to the best of registrant's knowledge, in definitive proxy or information statements incorporated by reference in Part III of this Form 10-K or any amendment to this Form 10-K. [ X ]

Indicate by check mark whether Registrant is an accelerated filer as defined in Rule 12b-2 of the Act. Yes ☐ No ☒

As of November 25, 2005, there were 7,305,360 shares of the registrant's Common Stock (\$.50 par value) outstanding. The aggregate market value of voting stock held by non-affiliates of the registrant as of such date was \$131,326,128 (6,893,760 shares at \$19.05 per share).

DOCUMENTS INCORPORATED BY REFERENCE:

Castle Energy Corporation and Subsidiaries  
Notes to Consolidated Financial Statements  
("\$000's" Omitted Except Share Amounts)

but only to take effect at a date after CTOGLP had sold the ORRJ. The Court of Appeals overturned that portion of the judgment that required CTOGLP to refund any money received by it. The Company does not at this time know if Dominion intends to petition the Supreme Court of Texas for review of this decision. The promissory note issued by CTOGLP will be cancelled and the restricted cash account of CTOGLP released when and if this judgment becomes final and non-appealable.

In fiscal 2004, the Company recorded an \$825 loss provision related to the Dominion litigation - primarily as a result of the District Court's granting of Dominion's motion for summary judgment in May 2004. The Company has reversed provision plus \$20 of accrued interest on the contingent note during fiscal 2005 primarily because the Court of Appeals reversed that District Court judgment against the Company. Nevertheless, Company's contingent note payable to Dominion CTOGLP's restricted cash account are required to remain in place until the Appeals Court judgment becomes non-appeal. Dominion filed a petition for appeal to the Texas Supreme Court of the appellate court's decision. If the Supreme Court reverses the Appeals Court decision, the Company would then become liable for the contingent note to Dominion plus in or some portion thereof. In such case, the Company would again record a loss provision.

Contingent Gain

GAMXX

On February 27, 1998, the Company entered into an agreement with Alexander Allen, Inc. ("AA") concerning amounts owed to the Company by AA and its subsidiary, GAMXX Energy, Inc. ("GAMXX"). The Company had made loans to GAMXX through 1991 in the aggregate amount of approximately \$8,000 and received a \$24,000 mortgage on the GAMXX property, an idle refining plant in Theodore, Alabama. When GAMXX was unable to obtain financing, the Company recorded a one hundred percent loss provision on its loans to GAMXX in 1991 and 1992 while still retaining its lender's lien against GAMXX. The Company subsequently filed and currently maintains a \$10,000 lien on the GAMXX properties.

In September 2005, the Company entered into an agreement to sell its lender's interest in GAMXX to an outside party for \$3,500 in January 2006. The agreement provides that the purchaser is responsible for unpaid property taxes (approximately \$1000 at September 30, 2005) on the property as well as for any environmental remediation that is required. The purchaser made a non-refundable deposit of \$10 upon executing the agreement. If the purchaser completes the purchase of the Company's interest in GAMXX, the Company expects that it will receive net proceeds of approximately \$3,200 after allowance for broker commissions and legal fees. If the purchaser does not ultimately purchase the Company's interest, the Company will simply retain the \$10 deposit.

In September 2005, another third party purchased the tax lien on the property by paying the unpaid property taxes of \$1,000. As a result, the Company or any purchaser of its interest has a year from the date of the purchase of the tax lien to redeem the tax lien by paying the tax lien purchaser \$1,000 plus interest. If the tax lien is not redeemed in that one-year period, the property will be owned by the purchaser of the tax lien and the Company's mortgage and lien on the property will be terminated.

The Company has carried its loans to GAMXX at zero for the last ten years. The Company will record any proceeds as "other income" if and when it collects such amount.

**DIRECTORS, OFFICERS, BOARD OF DIRECTORS AND  
PROFESSIONALS**  
(December 1, 2005)

**RICHARD E. STAEDTLER**  
President and Chief Executive Officer

**MARTIN R. HOFFMANN**  
Former Secretary of the Army

**JOHN P. KELLER**  
President, Keller Group, Inc.

**SIDNEY F. WENTZ**  
Chairman  
Former Chairman of The Robert  
Wood Johnson Foundation

**RUSSELL S. LEWIS**  
President, Lewis Capital Group

**OPERATING OFFICERS**

**RICHARD E. STAEDTLER**  
President and Chief Executive Officer

**MARY A. CADE**  
Chief Financial Officer  
Chief Accounting Officer

**WILLIAM C. LIEDTKE III**  
Vice President and General Counsel

**PRINCIPAL OFFICES**

357 South Gulph Road  
Suite 260  
King of Prussia, PA 19406

5623 North Western Avenue, Suite A  
Oklahoma City, OK 73118

next door to  
Alexander Allen/GamXX  
112 Township Line Road  
Three Valley Square, Suite 100  
Blue Bell, PA 19422

**PROFESSIONALS**

**Counsel**  
*Duane Morris LLP*  
30 South 17<sup>th</sup> Street  
Philadelphia, PA 19103

**Independent Accountants**  
*Grant Thornton LLP*  
One Leadership Square  
211 N. Robinson, Suite 1200  
Oklahoma City, OK 73102

**Registrar and Transfer Agent**  
*American Stock Transfer & Trust*  
40 Wall Street, 46th Floor  
New York, New York 10005



PENNSYLVANIA  
Department of State

## Corporations

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By Business Name  
By Business Entity ID  
Verify  
Verify Certification

### Business Entity Filing History

Date: 2/8/2006 (Select the link above to  
view the Business Entity's  
Filing History)

### Business Name History

Name	Name Type
ALEXANDER-ALLEN, INC	Current Name

### Business Corporation - Domestic - Information

Entity Number: 912686  
Status: Active  
Entity Creation Date: 3/25/1986  
Registered Office Address: 1024 LANCASTER AVE STE 206  
BRYN MAWR PA 19010-0  
Mailing Address: No Address

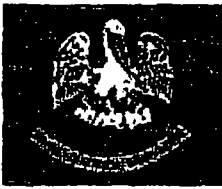
### Officers

Name: ERNEST B HARDY  
Title: President  
Address: 1 VALLEY SQ  
512 TWNSHP LNE RD 103  
BLUE BELL PA 19422-0

next door(?)  
to castle  
Energy

Name: ERNEST B HARDY  
Title: Treasurer  
Address: 1 VALLEY SQ  
512 TWNSHP LNE RD 103  
BLUE BELL PA 19422-0

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Louisiana Secretary of State  
**COMMERCIAL DIVISION**  
Corporations Database



**Louisiana Secretary of State  
Detailed Record**

Charter/Organization ID: 34170063D

Name: GAMXX ENERGY, INC.

Merger Information: MERGED INTO ALEXANDER-ALLEN, INC., A PENNSYLVANIA CORP. NOT

QUAL. IN LA. ON 1-14-94

Type Entity: Business Corporation

Status: Not Active (Voluntary action)

Last Report Filed on 12/23/1993

Mailing Address: 1021 LANCASTER AVENUE, SUITE 206, BRYN MAWR, PA 19010

Domicile Address: C T CORPORATION SYSTEMS, 8550 UNITED PLAZA BLVD., BATON ROUGE, LA 70809

Incorporated: 03/14/1985

Registered Agent (Appointed 12/23/1993): C T CORPORATION SYSTEM, 8550 UNITED PLAZA BLVD., BATON RI  
LA 70809

Director: ERNEST B. HARDY, 1021 LANCASTER AVENUE, SUITE 206, BRYN MAWR, PA 19010

Amendments on File

MERGER (01/14/1994)

AMENDMENT (05/01/1991)

DOMICLE, AGENT CHG OR RESIGN OF AGT (09/27/1988)

New Search

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# REFERENCE

9

## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

POST OFFICE BOX 301463 36130-1463 ♦ 1400 COLISEUM BLVD 36110-2059

MONTGOMERY, ALABAMA

WWW.ADEM.STATE.AL.US

(334) 271-7700

ONIS "TREY" GLENN, III, P.E.

DIRECTOR

BOB RILEY

GOVERNOR

Facsimiles: (334)

Administration: 271-7950  
General Counsel: 394-4332  
Communication: 394-4383  
Air: 279-3044  
Land: 279-3050  
Water: 279-3051  
Groundwater: 270-5631  
Field Operations: 272-8131  
Laboratory: 277-6718  
Mining: 394-4326

January 18, 2007

CERTIFIED MAIL 7005 1820 0003 1878 9052  
RETURN RECEIPT REQUESTED

Russell E. Myles, Authorized Member  
Hamilton Blvd., LLC.  
C/O J. Stephen Harvey, Esq.  
McDowell Knight Roedder & Sledge, LLC  
63 South Royal Street, Suite 900  
Riverview Plaza  
Mobile, Alabama 36601

Re: Former GAMXX Refinery Site  
Voluntary Cleanup Program Site Number 461-9415  
Theodore, Mobile County, Alabama

Dear Mr. Miles:

The GAMXX site was enrolled in the Alabama Department of Environmental Management's (ADEM) Brownfield Redevelopment and Voluntary Cleanup Program (VCP) by Hamilton Blvd., LLC on April 20, 2006, in lieu of pending environmental remedial action by the US Environmental Protection Agency (EPA). On January 11, 2007, ADEM and EPA personnel conducted a joint inspection of the site. The inspection revealed that an above-ground storage tank (T-202) was leaking petroleum products within the bermed area of the tank, in violation of State and Federal rules and regulations.

Enrollment in the ADEM VCP does not preclude either ADEM or EPA from initiating an administrative enforcement action for violations of State or Federal environmental laws. Failure to immediately address the release from Tank T-202 may result in such an administrative action. Issuance of an administrative order will cause the site to be removed from the VCP. Please submit written correspondence describing Hamilton Blvd., LLC's intentions concerning this matter within seven (7) days of receipt of this letter.

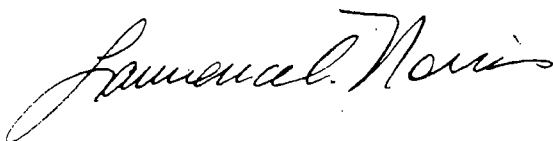




Mr. Russell E. Myles  
January 18, 2007  
Page 2

If you have questions or comments please contact me by telephone at (334)279-3053 or email at lan@adem.state.al.us.

Sincerely,



Lawrence A. Norris, Chief  
Redevelopment Section  
Environmental Services Branch

cc: G. Dave Davis, ADEM  
Dean Ullock, EPA Region 4  
Shane Hitchcock, EPA Region 4  
J. Stephen Harvey, Esq.


**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Russell E. Myles  
c/o J. Stephen Harvey  
63 S. Royal St. Ste. 900  
Riverview Plaza  
Mobile, AL 36601

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature ☐ Agent  
 ☐ Addressee  
B. Received by (Printed Name) C. Date of Delivery  
LINDA LUCASSEN 1-22-07

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type  
☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

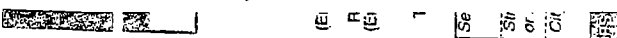
2. Article Number  
(Transfer from service label)

7005 1820 0003 1878 9052

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-101540



1506 828T E000 028T 5002

# REFERENCE

10

# McDOWELL KNIGHT

McDOWELL KNIGHT ROEDDER & SLEDGE L.L.C.  
LAWYERS

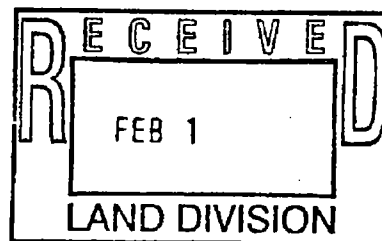
J. STEPHEN HARVEY

Direct Dial: 251-431-8819  
sharvey@mcdowellknight.com

January 29, 2007

**VIA CERTIFIED MAIL AND FIRST CLASS MAIL**

Mr. Lawrence A. Norris, Chief  
Redevelopment Section  
Environmental Services Branch  
Alabama Department of Environmental Management  
Post Office Box 301463  
Montgomery, AL 36130-1463



Re: Former GAMXX Refinery Site  
Voluntary Clean Up Program Site Number 461-9415  
Theodore, Mobile County, Alabama

Dear Mr. Norris:

This letter responds to your letter to Russel Myles of Hamilton Blvd., LLC ("Hamilton") dated January 18, 2007, and our subsequent phone conversation on January 24, regarding the above site and storage tank (T-202). I received your letter on January 22.

Hamilton is aware of the condition of said storage tank, and has always intended to address the problem. When Hamilton first met with EPA, however, Hamilton was urged to address the above ground issues first, such as the materials in the storage drums, materials in the laboratory, asbestos, etc. Hamilton therefore prepared and submitted an initial plan with ADEM under the Voluntary Cleanup Program ("VCP") addressing only the above ground issues. This plan was approved by ADEM and Hamilton has been working diligently since that time to complete that part of the cleanup. I received a letter from Antwan Parker dated January 17 acknowledging that the cleanup under this plan has been completed. Hamilton will now start working on its assessment and plan for the T-202 storage tank.

Hamilton intends to address the Tank T-202 issue through the VCP. Hamilton is engaging an engineering firm and/or a qualified contractor to assess the condition of Tank T-202 and to address what needs to be done to correct/remedy the situation. As soon as Hamilton receives a proposal from this engineering firm and/or contractor, Hamilton will prepare and file the second phase of its plan with ADEM under the VCP to address the T-202 and possibly other issues.

January 29, 2007

Page 2

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I hope this sufficiently addresses the issues raised in your letter. If Hamilton needs to do something different, please forward me a letter instructing Hamilton what it should do. Hamilton wants this site to stay in the VCP and does not want an administrative order issued by ADEM or EPA causing a removal of this site from the VCP.

Very truly yours,



J. Stephen Harvey  
For the Firm

JSH/al

M:190697

cc: Mr. R. E. Myles  
Mr. John Ramsay  
by email

# REFERENCE

## II

## ***AAI-Gamxx Site Investigation Narrative***

***Prepared by Phillip Skaggs***

**EPA ID # ALD095697058**

***Ref # 6691***

Under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) the Superfund Amendments Reauthorization Act of 1986 (SARA) and a cooperative agreement between the U.S Environmental Protection Agency and the Alabama Department of Environmental Management, (ADEM) has conducted a Site Investigation of the Gamxx Site in Theodore, Mobile County, Alabama. Gamxx is located on Hamilton street in Theodore. The coordinates for the site are 30N 33'10.25" 88W 07' 51.03". The purpose of the investigation was to assess the threat to human health and the environment the site may pose. This included reviewing existing information, limited sampling, and evaluating the site under the Hazard Ranking System (HRS).

### ***Site Description and History:***

The AAI- Gamxx site is an inactive refining and storage facility. The site is currently owned by Ernest B. Hardy. The AAI-Gamxx site was operated by a succession of companies, initially Alabama Refining Company, Inc. (from 1963 to 1967), the Marion Corporation (from 1967 to 1983), and finally Gamxx Energy, Inc. (from 1985 to 1990). The site was used as a refinery and as a storage area for various petroleum products, such as crude oil, leaded gasoline, JP-4 jet fuel, and naphtha. The known disposal practices in evidence thus far are of the Marion Corporation generating two caustic waste streams and a paper company utilizing one stream and the other was manifested and sent to Oklahoma for deep well injection. It also appears that both spent caustic solutions and API separator sludge was transported by

4/28/1999



# REFERENCE

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Full report in:

GAMXX-AAI Site  
ALD095697058  
Cenda # 6691





## EXECUTIVE SUMMARY

The purpose of the investigation was to determine the presence, if any, of subsurface impact to soil and groundwater, and whether evidence of environmental liability exists at the former GAMXX refinery site (site) that would warrant further evaluation.

The site, approximately 121 acres in size, is located on the southwest corner of the intersection of Range Line Road and Hamilton Boulevard, Theodore, Alabama. The entire facility is surrounded by chain link fencing with the main entrance gate on the north side along Hamilton Boulevard.

On April 2, 2002 through April 5, 2002, ATC contracted Singley Construction Company to advance 47 soil borings via Geoprobe™ techniques. The soil borings (SB-1 through SB-28, SB-29 through SB-41, and SB-46 through SB-52) were placed across the site in order to determine if evidence of environmental liability exists at the former GAMXX facility. Each soil boring was sampled continuously (2 foot centers) until the boring was terminated. The termination depths of the borings varied from 8 feet below land surface (bls) to 16 feet bls. Termination depths of the individual borings were determined based on groundwater level, type of soils encountered, the presence of free-phase hydrocarbons, and/or the lack of Organic Vapor Analyzer (OVA) readings. Soil borings SB-29 and SB-42 through SB-45 were advanced with a stainless steel hand auger. Sediment samples were collected from the main on-site drainage ditches (SS-55 through SS-57) and two off-site drainage points (SS-53 and SS-54).

Subsequent to the completion of the soil borings, each boring was converted into a one-inch inside diameter (ID) temporary monitoring well. Each temporary well was generally constructed using one-inch ID, schedule 40 PVC screen and riser pipe. A 10-foot section of 0.010 inch slotted screen was set at the bottom of each well.

Sediment, soil and groundwater samples collected during the assessment were analyzed for volatile organic compounds (VOCs) by USEPA Method 8260, semivolatile organic compounds (SVOCs) by USEPA Method 8270 and heavy metals. One shallow (0 to 2') soil sample (SB-29) was collected from the former electrical substation area and was analyzed for the presence of polychlorinated biphenyls (PCBs).

Based on the Phase II assessment conducted at the facility the following conclusions were made:

- Impact to soil has occurred in areas of the facility from former operations. A discussion of the areas and the impact follows:

Southeast Tank Farm: Benzene (SB-2, SB-3), xylenes (SB-6), naphthalene (SB-9) and cadmium (SB-4) exceeded ADEM Initial Screening Levels (ISLs) for soil in this area.

Crude Unit: Cadmium concentrations in SB-34 and SB-35 exceeded soil ISLs in this area.

Former Laboratory and Maintenance Building Area: Boring SB-33 had an ISL exceedance of benzene and SB-30 had an exceedance of cadmium.

Power Former / Condensate Unit Area: Borings SB-24 and SB-27 exceeded the soil ISL for cadmium in these areas.

Southwest Tank Farm: SB-46 contained concentrations of benzene, ethylbenzene, and total xylenes above ADEM ISLs. Boring SB-46 had concentrations of ethylbenzene and total xylenes above ISLs. Boring SB-52 exceeded the cadmium ISL.

Northwest Tank Farm: Cadmium concentrations were above the ISL in SB-37, SB-38 and SB-41.

Leaded Gasoline Tank Farm: Chromium concentrations in SB-11, SB-13, and SB-14 were above the ISL. The Lead ISL was exceeded by SB-11 through SB-16.

Former Flare Stack Area and the Former Electrical Substation: No VOC, SVOC or heavy metals concentrations exceeded soil ISLs. PCBs were not detected in the former electrical substation area.

Truck Loading/Unloading Area: Boring SB-17 exceeded ISLs for toluene, ethylbenzene, total xylenes, naphthalene and cadmium. Boring SB-18 exceeded the ISLs for benzene, toluene, ethylbenzene, total xylenes, 1,3,5-trimethylbenzene, 1,2,4-trimethylbenzene, naphthalene and cadmium. Borings SB-20 and SB-21 had cadmium concentrations above the ISL for this parameter.

Sediment Samples: Sample SS-54, located downstream from the facility oil/water separator was found to exceed ISLs for cadmium, chromium and lead.

- Additionally, Impact to groundwater has occurred in areas of the facility from former operations:

Southeast Tank Farm: Benzene exceeded the ISL in borings SB-1 and SB-7. Cadmium exceeded the ISL in SB-5 and SB-7. Lead exceeded the ISL in SB-5, SB-7 and SB-10. Naphthalene exceeded the ISL in SB-10.

Crude Unit: No groundwater VOCs, SVOCs or heavy metals concentrations exceeded ISLs in this area.

Former Laboratory and Maintenance Building Area: Benzene concentrations in SB-30, SB-31, SB-32 and SB-33 exceeded the ISL. Naphthalene in SB-30 exceeded the ISL.

Power Former / Condensate Unit Area: Boring SB-26 exceeded the ISL for lead. Boring SB-28 exceeded the ISL for naphthalene.

Southwest Tank Farm: Boring SB-46 had concentrations of lead and naphthalene above ADEM ISLs. Boring SB-48 had concentrations of cadmium, lead and benzene above ISLs. Boring SB-50 exceeded the lead ISL. Boring SB-51 exceeded the ISLs for cadmium and lead. Boring SB-52 exceeded the ISL for lead.

Northwest Tank Farm: The lead concentration was above the ISL in SB-37. The naphthalene concentration in SB-38 exceeded the ISL.

Leaded Gasoline Tank Farm: Groundwater lead concentrations exceeded the ISL in borings SB-13, SB-14 and SB-16. The cadmium ISL was exceeded in SB-13 and SB-16.

Former Flare Stack Area and the Former Electrical Substation: The samples collected here did not penetrate the groundwater table, therefore no samples were collected for analysis.

Truck Loading/Unloading Area: Boring SB-17 exceeded groundwater ISLs for benzene, toluene, ethylbenzene, total xylenes, naphthalene, lead and cadmium. Boring SB-18 exceeded the groundwater ISLs for benzene, toluene, ethylbenzene, total xylenes and naphthalene. Borings SB-19 and SB-21 had lead concentrations above the ISL for this parameter. Boring SB-22 exceeded the groundwater ISLs for benzene, toluene, ethylbenzene, total xylenes and naphthalene.

- Impact was noted at the former underground storage tank (UST) area. This portion of the assessment is documented as a separated report.
- LNAPL was encountered in the southwest tank farm in boring SB-4.
- Off-site heavy metals impact was noted downstream of the facility oil/water separator.
- The asbestos and lead surveys have been postponed until Castle has reviewed the Phase II Assessment report.

Based on the data gathered during this Phase II assessment, ATC recommends the following:

- Approximately 7,500 cubic yards of soil is impacted with VOCs and SVOCs above ADEM ISLs. To excavate and landfill this material ATC estimates costs of \$450,000 to \$500,000. Other treatment technologies for this sort of impact may be evaluated such as landfarming or vapor extraction; however, these technologies are more time and capital intensive.
- ATC recommends quarterly sampling and analysis of the four permanent groundwater monitoring wells.
- The extent of the heavy metals impact downstream of the facility oil/water separator is unknown. Additional sampling downstream is recommended.

The former UST area has subsurface impact and will require additional assessment and remediation. The ADEM UST Division would have to approve any actions taken in this area.

A 2-methylnaphthalene concentration of 19 mg/l was detected in SB-46. No other SVOC parameters were found above detection limits in this area.

#### 4.0 CONCLUSIONS

Based on the Phase II assessment conducted at the facility the following conclusions were made:

- Impact to soil has occurred in areas of the facility from former operations. A discussion of the areas and the impact follows:

Southeast Tank Farm: Benzene (SB-2, SB-3), xylenes (SB-6), naphthalene (SB-9) and cadmium (SB-4) exceeded ADEM Initial Screening Levels (ISLs) for soil in this area.

Crude Unit: Cadmium concentrations in SB-34 and SB-35 exceeded soil ISLs in this area.

Former Laboratory and Maintenance Building Area: Boring SB-33 had an ISL exceedance of benzene and SB-30 had an exceedance of cadmium.

Power Former / Condensate Unit Area: Borings SB-24 and SB-27 exceeded the soil ISL for cadmium in these areas.

Southwest Tank Farm: SB-46 had concentrations of benzene, ethylbenzene and total xylenes above ADEM ISLs. Boring SB-46 had concentrations of ethylbenzene and total xylenes above ISLs. Boring SB-52 exceeded the cadmium ISL.

Northwest Tank Farm: Cadmium concentrations were above the ISL in SB-37, SB-38 and SB-41.

Leaded Gasoline Tank Farm: Chromium concentrations in SB-11, SB-13, and SB-14 were above the ISL. The Lead ISL was exceeded by SB-11 through SB-16.

Former Flare Stack Area and the Former Electrical Substation: No VOC, SVOC or heavy metals concentrations exceeded soil ISLs. PCBs were not detected in the former electrical substation area.

Truck Loading/Unloading Area: Boring SB-17 exceeded ISLs for toluene, ethylbenzene, total xylenes, naphthalene and cadmium. Boring SB-18 exceeded the ISLs for benzene, toluene, ethylbenzene, total xylenes, 1,3,5-trimethylbenzene, 1,2,4-trimethylbenzene, naphthalene and cadmium. Borings SB-20 and SB-21 had cadmium concentrations above the ISL for this parameter.

Sediment Samples: Sample SS-54, located downstream from the facility oil/water separator was found to exceed ISLs for cadmium, chromium and lead.

- Impact to groundwater has occurred in areas of the facility from former operations as well:

Southeast Tank Farm: Benzene exceeded the ISL in borings SB-1 and SB-7. Cadmium exceeded the ISL in SB-5 and SB-7. Lead exceeded the ISL in SB-5, SB-7 and SB-10. Naphthalene exceeded the ISL in SB-10.

Crude Unit: No groundwater VOCs, SVOCs or heavy metals concentrations exceeded ISLs in this area.

Former Laboratory and Maintenance Building Area: Benzene concentrations in SB-30, SB-31, SB-32 and SB-33 exceeded the ISL. Naphthalene in SB-30 exceeded the ISL.

Power Former / Condensate Unit Area: Boring SB-26 exceeded the ISL for lead. Boring SB-28 exceeded the ISL for naphthalene.

Southwest Tank Farm: Boring SB-46 had concentrations of lead and naphthalene above ADEM ISLs. Boring SB-48 had concentrations of cadmium, lead and benzene above ISLs. Boring SB-50 exceeded the lead ISL. Boring SB-51 exceeded the ISLs for cadmium and lead. Boring SB-52 exceeded the ISL for lead.

Northwest Tank Farm: The lead concentration was above the ISL in SB-37. The naphthalene concentration in SB-38 exceeded the ISL.

Leaded Gasoline Tank Farm: Groundwater lead concentrations exceeded the ISL in borings SB-13, SB-14 and SB-16. The cadmium ISL was exceeded in SB-13 and SB-16.

Former Flare Stack Area and the Former Electrical Substation: The samples collected here did not penetrate the groundwater table, therefore no samples were collected for analysis.

Truck Loading/Unloading Area: Boring SB-17 exceeded groundwater ISLs for benzene, toluene, ethylbenzene, total xylenes, naphthalene, lead and cadmium. Boring SB-18 exceeded the groundwater ISLs for benzene, toluene, ethylbenzene, total xylenes and naphthalene. Borings SB-19 and SB-21 had lead concentrations above the ISL for this parameter. Boring SB-22 exceeded the groundwater ISLs for benzene, toluene, ethylbenzene, total xylenes and naphthalene.

- Impact was noted at the former underground storage tank (UST) area. This portion of the assessment is documented in a separate report.
- LNAPL was encountered in the southwest tank farm in boring SB-4.
- Off-site heavy metals impact was noted downstream of the facility oil/water separator.
- The asbestos and lead surveys have been postponed until Castle has reviewed the Phase II Assessment report.

## 5.0 RECOMMENDATIONS

Based on the data gathered during this Phase II assessment, ATC recommends the following:

- Approximately 7,500 cubic yards of soil is impacted with VOCs and SVOCs above ADEM ISLs. To excavate and landfill this material ATC estimates costs of \$450,000 to \$500,000. Other treatment technologies for this sort of impact may be evaluated such as landfarming or vapor extraction; however, these technologies are more time and capital intensive.
- ATC recommends quarterly sampling and analysis of the four permanent groundwater monitoring wells.
- The extent of the heavy metals impact downstream of the facility oil/water separator is unknown. Additional sampling downstream is recommended.
- The former UST area has subsurface impact and will require additional assessment and remediation. The ADEM UST Division would have to approve any actions taken in this area.

# REFERENCE

13





## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

POST OFFICE BOX 301463 36130-1463 ♦ 1400 COLISEUM BLVD. 36110-2059

MONTGOMERY, ALABAMA

WWW.ADEM.STATE.AL.US

(334) 271-7700

ONIS "TREY" GLENN, III, P.E.  
DIRECTOR

BOB RILEY  
GOVERNOR

January 17, 2007

Mr. Stephen Harvey  
Hamilton Blvd., LLC  
63 South Royal Street, Suite 900  
Mobile, Alabama 36602

Re: Gamxx Energy  
4000 Hamilton Blvd  
Theodore, Mobile County, Alabama  
VCP# 461-9415

Dear Mr. Harvey:

A technical review of the Voluntary Cleanup Plan for the Gamxx Energy site in Theodore, Mobile County, Alabama has been completed. The Clean-Up Work Plan appears to meet the Voluntary Cleanup Plan requirements contained in the ADEM Admin. Code R. 335-15-4-.04. Please be advised that the remedies cited in the Voluntary Cleanup Plan are required to be placed on public notice for a period of 30 days to meet the programmatic requirements contained in ADEM Admin. Code R. 335-15-6. If you have any further questions you may contact Antwan Parker at (334) 394-4387.

Sincerely,

Antwan Parker  
Environmental Services Branch

Facsimiles: (334)

Administration: 271-7950  
General Counsel: 394-4332  
Communication: 394-4363  
Air: 279-3044  
Land: 279-3050  
Water: 279-3051  
Groundwater: 270-5631  
Field Operations: 272-6131  
Laboratory: 277-6718  
Mining: 394-4326



# REFERENCE

14

U.S. EPA REGION IV

# SDMS

## Unscannable Material Target Sheet

DocID: 11030729 Site ID: ALSD95697058

Site Name: GAMXX Energy

Nature of Material:

Map: ☒

Computer Disks: ☐

Photos: ☐

CD-ROM: ☐

Blueprints: ☐

Oversized Report: ☐

Slides: ☐

Log Book: ☐

Other (describe): Site Map

Amount of material: \_\_\_\_\_

\* Please contact the appropriate Records Center to view the material \*

# REFERENCE

15

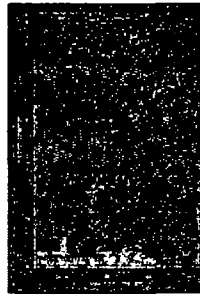
**U.S. Fish & Wildlife Service**  
**Daphne Ecological Services Field Office**  
***Daphne, Alabama***



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**ALABAMA'S FEDERALLY LISTED SPECIES**



**BY COUNTY**

**Updated - August 21, 2006**

We are continually updating this list and, therefore, it may be incomplete and is provided strictly for informational purposes. This list does not constitute any form of Section 7 consultation. We recommend that this office (Daphne, AL Field Office - USFWS) be contacted for more current, site specific information prior to project activities. To be certain of occurrence, surveys should be conducted by qualified biologists to determine if a Federally protected species occurs within a project area.

Key to codes on list:

E - Endangered  
T - Threatened  
C - Candidate Species  
(P) - Possible Occurrence

**Baldwin**

E - Alabama beach mouse *Peromyscus polionotus ammobates*  
E - Perdido Key beach mouse *Peromyscus polionotus trissylepsis*  
E - West Indian manatee *Trichechus manatus*  
E - Red-cockaded woodpecker *Picoides borealis*  
E - Least tern *Sterna antillarum*  
T - Piping plover *Charadrius melodus*

T - Bald eagle *Haliaeetus leucocephalus*  
E - Wood stork *Mycteria americana*  
E - Alabama red-bellied turtle *Pseudemys alabamensis*  
T - Loggerhead sea turtle *Caretta caretta*  
E - Kemp's ridley sea turtle *Lepidochelys kempii*  
T - Green sea turtle *Chelonia mydas* (P)  
T - Gulf sturgeon *Acipenser oxyrinchus desotoi*  
E - Alabama sturgeon *Scaphirhynchus suttkusi*  
E - Heavy pigtoe mussel *Pleurobema taitianum*  
T - Inflated heelsplitter mussel *Potamilus inflatus*  
E - American chaffseed *Schwalbea americana*  
T - Eastern indigo snake *Drymarchon corais couperi* (P)  
T - Flatwoods salamander *Ambystoma cingulatum* (P)  
C - Panhandle lily *Lillium iridollae*

#### Mobile

E - West Indian manatee *Trichechus manatus*  
T - Piping plover *Charadrius melodus*  
E - Red-cockaded woodpecker *Picoides borealis*  
E - Least tern *Sterna antillarum*  
T - Bald eagle *Haliaeetus leucocephalus*  
T - Eastern indigo snake *Drymarchon corais couperi*  
T - Gopher tortoise *Gopherus polyphemus*  
E - Alabama red-bellied turtle *Pseudemys alabamensis*  
T - Loggerhead sea turtle *Caretta caretta*  
E - Kemp's ridley sea turtle *Lepidochelys kempii* (P)  
T - Green sea turtle *Chelonia mydas* (P)  
T - Gulf sturgeon *Acipenser oxyrinchus desotoi*  
T - Flatwoods salamander *Ambystoma cingulatum* (P)  
E - Louisiana quillwort *Isoetes louisianensis* (P)  
C - Black pine snake *Pituophis melanoleucus lodingi*

<http://www.fws.gov/daphne/es/specieslst.htm>

[Federal Register: July 9, 2007 (Volume 72, Number 130)]

[Rules and Regulations]

[Page 37345-37372]

From the Federal Register Online via GPO Access [wais.access.gpo.gov]

[DOCID:fr09jy07-6]

[[Page 37345]]

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Part III

Department of the Interior

-----  
Fish and Wildlife Service

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**50 CFR Part 17**

Endangered and Threatened Wildlife and Plants; Removing the Bald Eagle in the Lower 48 States From the List of Endangered and Threatened Wildlife; Final Rule; Endangered and Threatened Wildlife and Plants; Draft Post-Delisting and Monitoring Plan for the Bald Eagle (*Haliaeetus leucocephalus*) and Proposed Information Collection; Notice

[[Page 37346]]

-----  
DEPARTMENT OF THE INTERIOR

Fish and Wildlife Service

**50 CFR Part 17**

**RIN 1018-AF21**

**Endangered and Threatened Wildlife and Plants; Removing the Bald Eagle in the Lower 48 States From the List of Endangered and Threatened Wildlife**

AGENCY: Fish and Wildlife Service, Interior.

ACTION: **Final rule.**

-----  
SUMMARY: The best available scientific and commercial data indicate that the bald eagle has recovered. Therefore, under the authority of the Endangered Species Act of 1973, as amended (Act), we, the U.S. Fish and Wildlife Service, remove (delist) the bald eagle (*Haliaeetus leucocephalus*) in the lower 48 States of the United States from the Federal List of Endangered and Threatened Wildlife. This determination is based on a thorough review of all available information, which indicates that the threats to this species have been eliminated or reduced to the point that the species has recovered and no longer meets the definition of threatened or endangered under the Act.

Fueled by a reduction in the threats to the bald eagle, the population in the lower 48 States has increased from approximately 487 breeding pairs in 1963, to an estimated 9,789 breeding pairs today. The recovery of the bald eagle is due in part to the reduction in levels of persistent organochlorine pesticides (such as DDT) occurring in the environment and habitat protection and management actions. The protections provided to the bald eagle under the Bald and Golden Eagle Protection Act (BGEPA) and the Migratory Bird Treaty Act (MBTA) will continue to remain in place after the species is delisted. To help provide more clarity on the management of bald eagles after delisting, we recently published a regulatory definition of ``disturb'', the final National Bald Eagle Management Guidelines and a proposed rule for a new permit that would authorize limited take under BGEPA and grandfather existing Act authorizations.

DATES: This rule is effective August 8, 2007.

FOR FURTHER INFORMATION CONTACT: Chief, Branch of Recovery and Delisting, telephone (703) 358-2061 or facsimile (703) 358-1735.

Additional information is also available on our Web site at <http://www.fws.gov/migratorybirds/BaldEagle.htm>. Individuals who use a telecommunications device for the deaf (TDD) may call the Federal Relay Service at 1-800-877-8339 for TTY assistance, 24 hours a day, 7 days a week.

Whole thing can be read at this site....

[http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2007\\_register&docid=fr09jy07-6](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2007_register&docid=fr09jy07-6)



# REFERENCE

16

**U.S. Census Bureau****State & County QuickFacts****Mobile County, Alabama**

<b>People QuickFacts</b>	<b>Mobile County</b>	<b>Alabama</b>
Population, 2006 estimate	404,157	4,599,030
Population, percent change, April 1, 2000 to July 1, 2006	1.1%	3.4%
Population, 2000	399,843	4,447,100
Persons under 5 years old, percent, 2005	7.3%	6.5%
Persons under 18 years old, percent, 2005	26.2%	23.9%
Persons 65 years old and over, percent, 2005	12.2%	13.2%
Female persons, percent, 2005	52.1%	51.5%
White persons, percent, 2005 (a)	62.2%	71.4%
Black persons, percent, 2005 (a)	34.5%	26.4%
American Indian and Alaska Native persons, percent, 2005 (a)	0.7%	0.5%
Asian persons, percent, 2005 (a)	1.6%	0.8%
Native Hawaiian and Other Pacific Islander, percent, 2005 (a)	0.0%	0.0%
Persons reporting two or more races, percent, 2005	1.0%	0.9%
Persons of Hispanic or Latino origin, percent, 2005 (b)	1.3%	2.3%
White persons not Hispanic, percent, 2005	61.1%	69.3%
Living in same house in 1995 and 2000, pct 5 yrs old & over	58.1%	57.4%
Foreign born persons, percent, 2000	2.3%	2.0%
Language other than English spoken at home, pct age 5+, 2000	4.6%	3.9%
High school graduates, percent of persons age 25+, 2000	76.7%	75.3%
Bachelor's degree or higher, pct of persons age 25+, 2000	18.6%	19.0%
Persons with a disability, age 5+, 2000	86,863	945,705
Mean travel time to work (minutes), workers age 16+, 2000	25.2	24.8
Housing units, 2005	174,745	2,082,140
Homeownership rate, 2000	68.8%	72.5%
Housing units in multi-unit structures, percent, 2000	17.7%	15.3%
Median value of owner-occupied housing units, 2000	\$80,500	\$85,100
Households, 2000	150,179	1,737,080
Persons per household, 2000	2.61	2.49
Median household income, 2004	\$33,191	\$37,062
Per capita money income, 1999	\$17,178	\$18,189

Persons below poverty, percent, 2004	20.0%	16.1%
<b>Business QuickFacts</b>	<b>Mobile County</b>	<b>Alabama</b>
Private nonfarm establishments, 2005	9,242	101,976 <sup>2</sup>
Private nonfarm employment, 2005	157,260	1,667,526 <sup>2</sup>
Private nonfarm employment, percent change 2000-2005	0.5%	0.9% <sup>2</sup>
Nonemployer establishments, 2004	23,048	266,585 <sup>1</sup>
Total number of firms, 2002	27,900	309,544
Black-owned firms, percent, 2002	10.9%	9.3%
American Indian and Alaska Native owned firms, percent, 2002	0.9%	0.9%
Asian-owned firms, percent, 2002	2.6%	1.4%
Native Hawaiian and Other Pacific Islander owned firms, percent, 2002	F	0.0%
Hispanic-owned firms, percent, 2002	0.8%	0.8%
Women-owned firms, percent, 2002	27.9%	26.4%
Manufacturers shipments, 2002 (\$1000)	5,666,741	66,686,220
Wholesale trade sales, 2002 (\$1000)	3,144,855	43,641,369
Retail sales, 2002 (\$1000)	4,073,954	43,784,342
Retail sales per capita, 2002	\$10,194	\$9,771
Accommodation and foodservices sales, 2002 (\$1000)	438,793	4,692,297
Building permits, 2006	2,777	32,034
Federal spending, 2004 (\$1000)	2,458,037	39,047,473 <sup>2</sup>
<b>Geography QuickFacts</b>	<b>Mobile County</b>	<b>Alabama</b>
Land area, 2000 (square miles)	1,233.09	50,744.00
Persons per square mile, 2000	324.3	87.6
FIPS Code	097	01
Metropolitan or Micropolitan Statistical Area	Mobile, AL Metro Area	

1: The 2004 Nonemployer totals may be low due to late tax reporting in hurricane-impacted counties/regions in Alabama, Florida, Louisiana, Mississippi, and Texas.

2: Includes data not distributed by county.

(a) Includes persons reporting only one race.

(b) Hispanics may be of any race, so also are included in applicable race categories.

D: Suppressed to avoid disclosure of confidential information

F: Fewer than 100 firms

FN: Footnote on this item for this area in place of data

NA: Not available

S: Suppressed, does not meet publication standards

X: Not applicable

Z: Value greater than zero but less than half unit of measure shown

**U.S. Census Bureau****State & County QuickFacts****Mobile (city), Alabama**

<b>People QuickFacts</b>	<b>Mobile</b>	<b>Alabama</b>
Population, 2003 estimate	193,464	4,500,752
Population, percent change, April 1, 2000 to July 1, 2003	-2.9%	1.2%
Population, 2000	198,915	4,447,100
Population, percent change, 1990 to 2000	0.3%	10.1%
Persons under 5 years old, percent, 2000	7.3%	6.7%
Persons under 18 years old, percent, 2000	26.5%	25.3%
Persons 65 years old and over, percent, 2000	13.7%	13.0%
Female persons, percent, 2000	53.2%	51.7%
White persons, percent, 2000 (a)	50.4%	71.1%
Black or African American persons, percent, 2000 (a)	46.3%	26.0%
American Indian and Alaska Native persons, percent, 2000 (a)	0.2%	0.5%
Asian persons, percent, 2000 (a)	1.5%	0.7%
Native Hawaiian and Other Pacific Islander, percent, 2000 (a)	Z	Z
Persons reporting some other race, percent, 2000 (a)	0.5%	0.7%
Persons reporting two or more races, percent, 2000	1.0%	1.0%
Persons of Hispanic or Latino origin, percent, 2000	1.4%	1.7%
Living in same house in 1995 and 2000, pct 5 yrs old & over	54.9%	57.4%
Foreign born persons, percent, 2000	2.9%	2.0%
Language other than English spoken at home, pct age 5+, 2000	5.4%	3.9%
High school graduates, percent of persons age 25+, 2000	80.5%	75.3%
Bachelor's degree or higher, pct of persons age 25+, 2000	24.9%	19.0%
Mean travel time to work (minutes), workers age 16+, 2000	21.9	24.8
Housing units, 2000	86,187	1,963,711
Homeownership rate, 2000	59.3%	72.5%
Median value of owner-occupied housing units, 2000	\$81,400	\$85,100
Households, 2000	78,480	1,737,080
Persons per household, 2000	2.46	2.49
Median household income, 1999	\$31,445	\$34,135
Per capita money income, 1999	\$18,072	\$18,189
Persons below poverty, percent, 1999	21.2%	16.1%

<b>Business QuickFacts</b>	<b>Mobile</b>	<b>Alabama</b>
Wholesale trade sales, 1997 (\$1000)	2,669,040	40,986,328
Retail sales, 1997 (\$1000)	2,573,227	36,623,327
Retail sales per capita, 1997	\$12,838	\$8,477
Accommodation and foodservices sales, 1997 (\$1000)	301,597	3,881,782
Total number of firms, 1997	15,697	285,206
Minority-owned firms, percent of total, 1997	15.7%	9.9%
Women-owned firms, percent of total, 1997	25.8%	24.4%

<b>Geography QuickFacts</b>	<b>Mobile</b>	<b>Alabama</b>
Land area, 2000 (square miles)	118	50,744
Persons per square mile, 2000	1,687.1	87.6
FIPS Code	50000	01
Counties		

(a) Includes persons reporting only one race.

(b) Hispanics may be of any race, so also are included in applicable race categories.

FN: Footnote on this item for this area in place of data

NA: Not available

D: Suppressed to avoid disclosure of confidential information

X: Not applicable

S: Suppressed; does not meet publication standards

Z: Value greater than zero but less than half unit of measure shown

F: Fewer than 100 firms

Source U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, 2000 Census of Population and Housing, 1990 Census of Population and Housing, Small Area Income and Poverty Estimates, County Business Patterns, 1997 Economic Census, Minority- and Women-Owned Business, Building Permits, Consolidated Federal Funds Report, Census of Governments

Last Revised: Friday, 12-Jan-2007 16:03:32 EST

# **ATTACHMENT**

## **I**

U.S. EPA REGION IV

# SDMS

## Unscannable Material Target Sheet

DocID: 11030729 Site ID: ALD095697058

Site Name: GAMXX Energy

Nature of Material:

Map: ☒

Computer Disks: ☐

Photos: ☐

CD-ROM: ☐

Blueprints: ☐

Oversized Report: ☐

Slides: ☐

Log Book: ☐

Other (describe): Site Map

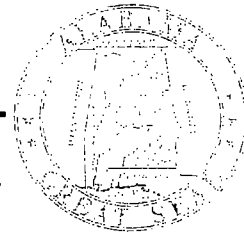
Amount of material: \_\_\_\_\_

\* Please contact the appropriate Records Center to view the material \*

# **ATTACHMENT**

**2**





## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

POST OFFICE BOX 301463 36130-1463 ♦ 1400 COLISEUM BLVD. 36110-2059

MONTGOMERY, ALABAMA

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ONIS "TREY" GLENN, III, P.E.

DIRECTOR

(Acting)

BOB RILEY

GOVERNOR

Facsimiles: (334)

Administration: 271-7950

General Counsel: 394-4332

Communication: 394-4383

Air: 279-3044

Land: 279-3050

Water: 279-3051

Groundwater: 270-5631

Field Operations: 272-8131

Laboratory: 277-6718

Mining: 394-4326

December 9, 2004

To: Dave Davis, Chief  
Environmental Assessment Section  
Hazardous Waste Branch  
Land Division

From: Bonnie L. Temple, ESII  
Site Assessment Unit  
Hazardous Waste Branch  
Land Division

Subject: Trip Report: AAI-GAMXX, CERCLIS No.: 6691  
4000 Hamilton Boulevard  
Theodore, Mobile County, Alabama 36582  
And  
Seabury Station, CERCLIS No.: 6798  
5670 Marshall Road  
Mobile, Mobile County, Alabama 36613

On December 7-8, 2004, you and I traveled to Mobile County to meet with EPA and its contractor to conduct site inspections at AAI-GAMXX and Seabury Station.

On December 7 we met Dean Ullock, EPA On-Scene Coordinator, and Martin Smith, Project Scientist of Weston Solutions, to exchange information concerning Seabury Station and discuss the sampling plans for the site. While the out buildings and other structures had been razed or removed, three large 2 millions petroleum tanks remain on site. The EPA representatives and I ascended one tank via the exterior spiral stairs and obtained digital photographs of the tanks and the immediate area. We also located an oil sump pit and the valve draining springs under Tank 3. More digital photographs were collected of the site and a movie clip was also collected from the top of one the storage tank previously mentioned. Little damage from Hurricane Ivan was noted. The two residences at the end of Marshall Road have been removed.



Dave Davis  
Memorandum  
Trip Report  
December 9, 2004

On Tuesday, December 8<sup>th</sup>, we met Dean Ullock and Martin Smith at AAI-GAMXX for that site visit. We exchanged information concerning AAI-GAMXX and discussed the sampling plans for this site. The gate was still locked, but access was obtained via a hole in the fence behind guard building. While we were there, digital photographs were collected of the tank farms, processing areas, metal balls and storage area, the storage building containing drums of unknown material, and the main office building. At least 14 transformers thought to contain PCBs were located in several electrical supply rooms in several of the buildings. The following changes have occurred since 1997:

- 1) Hurricane Ivan had destroyed the storage building door, and the contents of the drums stored inside have leaked onto the storage building floor.
- 2) Many had of the drums in the main storage building had Marion Oil labels.
- 3) Much more insulation has fallen off the external piping and columns due to a combination of age and Hurricane Ivan. It appears some of the insulation may be asbestos.
- 4) At the main office, the entire entrance door and frame had been removed for salvage by unknown persons.
- 5) The last logbook for the GAMXX facility was found in the office and the entry stated: "Shut Down Unit, 1-21-88, Put unit into mothballs...Don, A. M. F., Robert." A photo was taken of that log entry.

EPA will host a meeting in the near future to determine what assessment and remediation activity EPA will attempt, their scope of work, and their sampling plan. The State of Alabama will be represented by the Environmental Assessment Section.

BLT

cc: Rita Nichols, TCSA, Special Waste Unit

# ATTACHMENT

3

GAMXX Oil Refinery  
Theodore, Mobile County, Alabama  
December 6, 2004

Views of warehouse along Rangeline Road.



GAMXX Oil Refinery  
Theodore, Mobile County, Alabama  
December 6, 2004





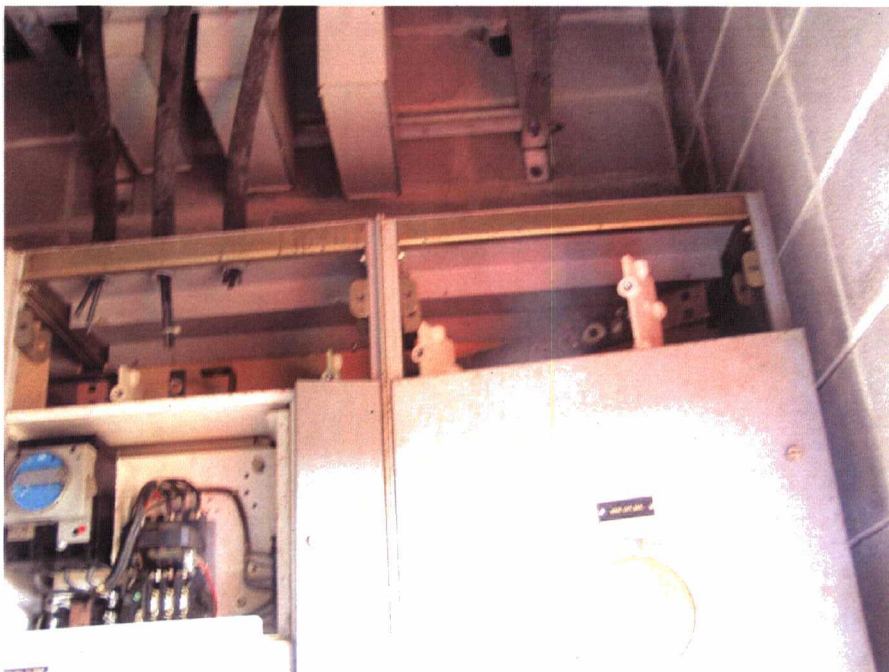
GAMXX Oil Refinery  
Theodore, Mobile County, Alabama  
December 6, 2004



GAMXX Oil Refinery  
Theodore, Mobile County, Alabama  
December 6, 2004



Following are additional views around GAMXX refinery showing site conditions.





GAMXX Oil Refinery  
Theodore, Mobile County, Alabama  
December 6, 2004





GAMXX Oil Refinery  
Theodore, Mobile County, Alabama  
December 6, 2004

Following photographs of processing unit showing metal and insulation falling from pipes and other structures.



GAMXX Oil Refinery  
Theodore, Mobile County, Alabama  
December 6, 2004





GAMXX Oil Refinery  
Theodore, Mobile County, Alabama  
December 6, 2004



Following photographs showing metal beads and other materials scattered around the site.





GAMXX Oil Refinery  
Theodore, Mobile County, Alabama  
December 6, 2004



GAMXX Oil Refinery  
Theodore, Mobile County, Alabama  
December 6, 2004

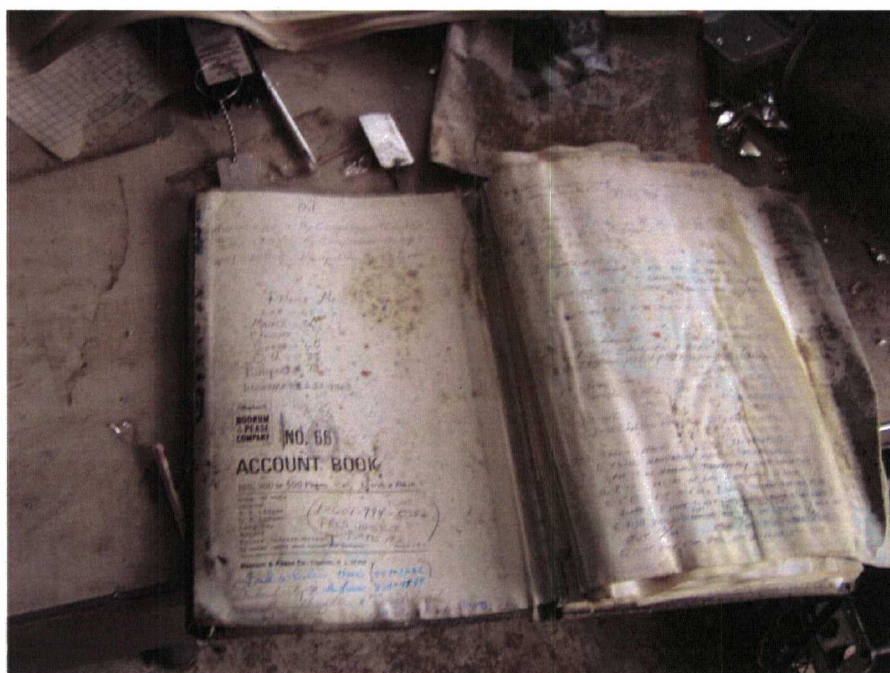
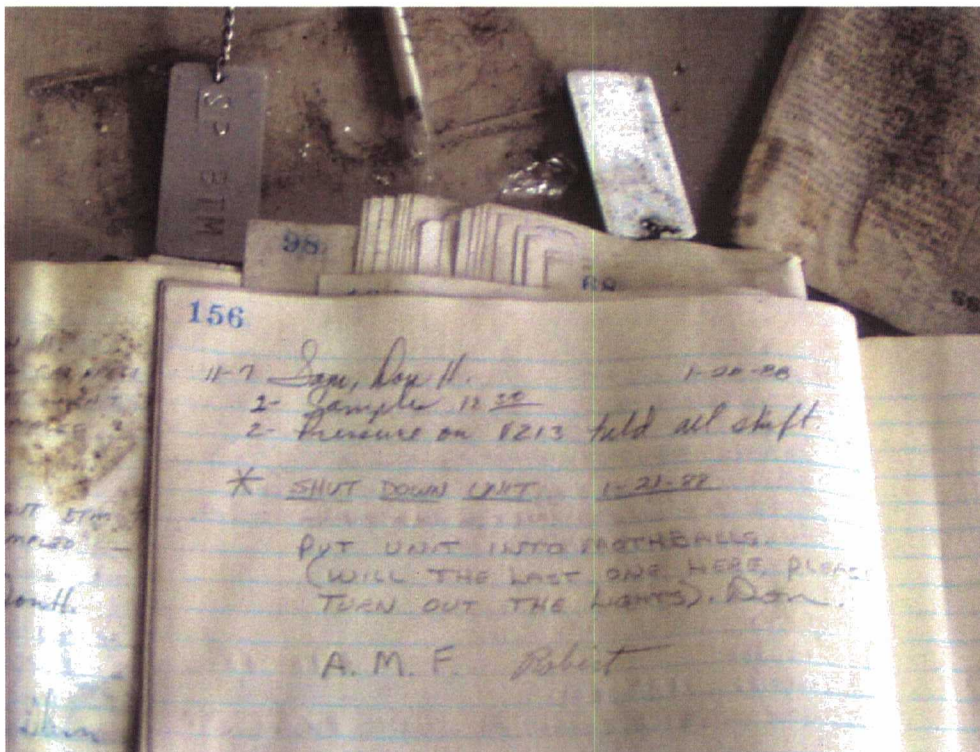


The following photographs show the condition of control room and resulting vandalism.





GAMXX Oil Refinery  
Theodore, Mobile County, Alabama  
December 6, 2004



GAMXX Oil Refinery  
Theodore, Mobile County, Alabama  
December 6, 2004



Following photograph shows the inside of the office showing the humor of vandals during their activities.

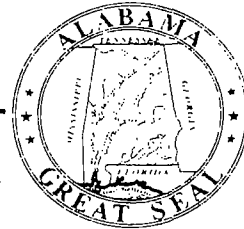


# **ATTACHMENT**

**4**



# ADEM



## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

POST OFFICE BOX 301463 36130-1463 • 1400 COLISEUM BLVD. 36110-2059

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ONIS "TREY" GLENN, III, P.E.

DIRECTOR

BOB RILEY

GOVERNOR

March 25, 2005

Facsimiles: (334)

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General Counsel: 394-4332

Communication: 394-4383

Air: 279-3044

Land: 279-3050

Water: 279-3051

Groundwater: 270-5631

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Laboratory: 277-6718

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To: Dave Davis, Chief  
Environmental Assessment Section  
Hazardous Waste Branch  
Land Division

From: Bonnie L. Temple, ESII  
Site Assessment Unit  
Hazardous Waste Branch  
Land Division

Subject: Trip Report: AAI-GAMXX, CERCLIS No.: 6691  
4000 Hamilton Boulevard  
Theodore, Mobile County, Alabama 36582  
And  
Seabury Station, CERCLIS No.: 6798  
5670 Marshall Road  
Mobile, Mobile County, Alabama 36613

On March 13, 2005, I traveled to Mobile, Alabama in order to attend the 8:00 am pre-assessment meeting with EPA, the U.S. Coast Guard Gulf Strike Team and Weston Solutions for pre-removal sampling and inspection at AAI-GAMXX and Seabury Station. Documentation from the Preliminary Assessments for both Seabury Station and GAMXX were utilized to perform pre-removal assessment and sampling activities.

Day 1: On December 14, 2005 I met Dean Ullock, EPA On-Scene Coordinator, and Martin Smith, Project Scientist of Weston Solutions, other Weston employees and the Gulf Coast Strike Team to exchange information concerning GAMXX and discuss the sampling plans for the GAMXX. We then convened at the GAMXX site to start the sampling being planned. Areas with possible asbestos contamination were cordoned off with hazardous tape. Two individuals with the Gulf Coast Strike Team and I inspected tanks to document visual contamination, tank status, and possible health risks. Tanks in areas A, B, and C were checked Monday. The HazCat process on the drums in the warehouse, groundwater sampling and soil samples were started this day. The many transformers onsite were addressed. They are old enough to contain PCBs.



Dave Davis  
Memorandum  
Trip Report  
December 9, 2004

Day 2: On March 15, 2005, I stopped by ADEM Field Operations to determine the closest shallow well to GAMXX. We needed a background well that would be out of any influence from GAMXX, since we don't know if the groundwater flows to the south, north or toward the east. With the assistance of Field Operations I determined potential sources for background groundwater. The most likely location was the Atkins Nursery in Theodore, Alabama. Tuesday afternoon we sampled this background well. This well is used at least once a week for drinking when the children are outside.

Tank locations D and E were checked and a leak at tank T-202 was found. HazCat of the drums, groundwater sampling and soil sampling for GAMXX was completed this day. Collection of the latitude and longitudes for each sample location on GAMXX needed to be completed. A cursory overview of Seabury Station was conducted by EPA personnel. GAMXX digital photographs were collected by ADEM and EPA.

Day 3: On March 16, 2005, we met at the Weston office to review plans for Seabury Station sampling. We then traveled to Seabury Station for pre-removal assessment activities. The Gulf Coast Strike Team determined the status of the three tanks and searched for any signs of leakage or spillage. Soil sample locations were chosen and sampled. One of the springs under Tank 3 was flowing. Groundwater was collected from this spring to determine groundwater status under Seabury Station. Seabury Creek and the surrounding area were investigated to determine the status of the creek. ADEM collected regular photographs of activities and tank status at Seabury. EPA collected photographs of sample locations.

Day 4: On March 17, 2005, a final meeting with Weston Solutions occurred prior to returning to Montgomery. Film from the regular camera was taken to Wal Mart and processed. One set of photographs was left with Weston Solution for possible inclusion in their report.

BLT



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Engineer - Architect - Planner  
762 Commonwealth Blvd  
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508/875-1073 - FAX 508/875-0178

C.G.L PROJ. No 9012

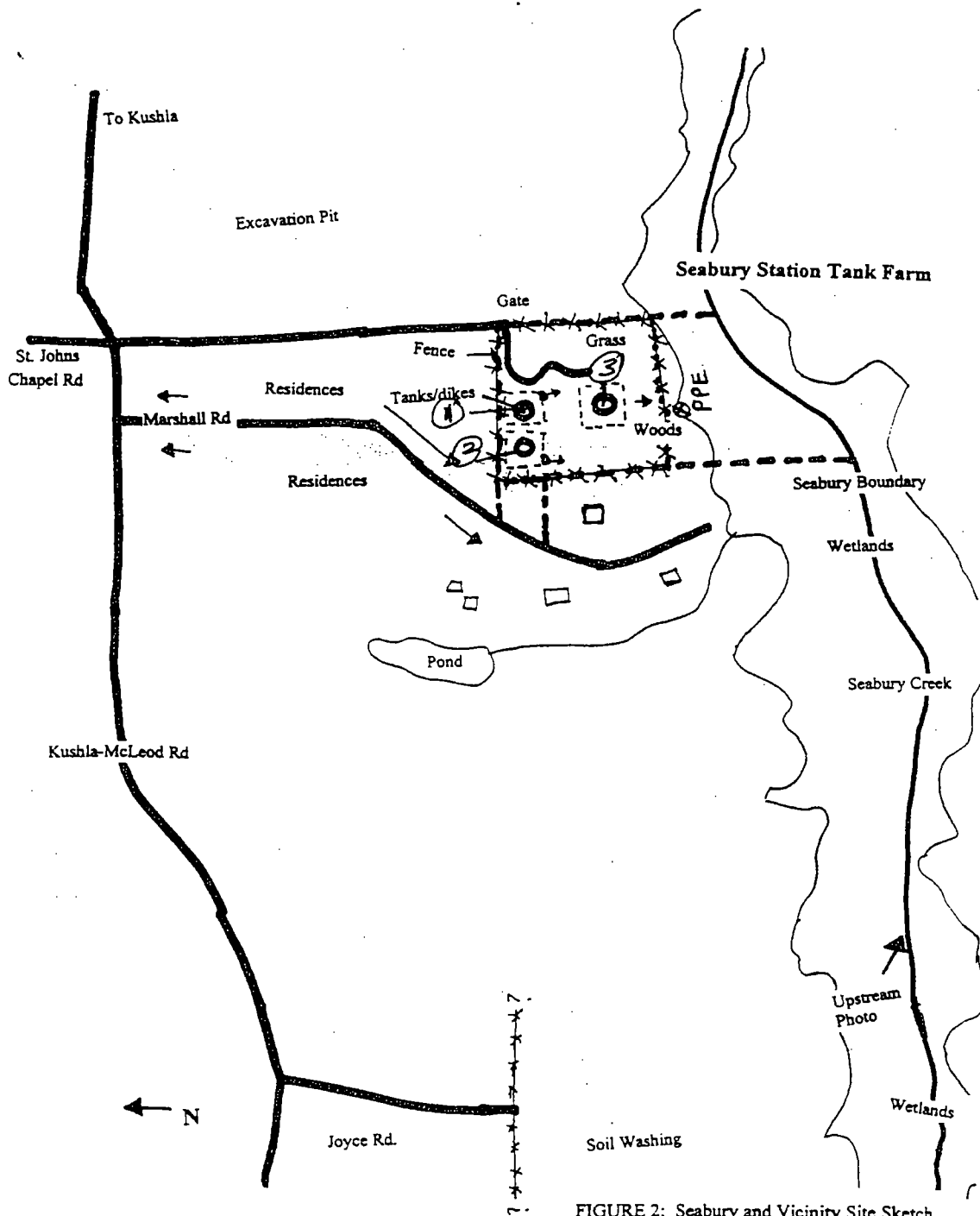


FIGURE 2: Seabury and Vicinity Site Sketch  
- NOT TO SCALE -

Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



US EPA Region 4, Weston Solutions and US Coast Guard Gulf Strike Team at GAMXX outside the office reviewing assignments for the day. View looking northeast.



View of office showing vandalism that has occurred. Front doors and frame have been removed.

Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



Weston official discussing operating procedures at refineries and identifying equipment and units.



View of inside of warehouse with drums and other materials spilled around the area.



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View of inside of abandoned warehouse prior to HazCat and sampling activities.



View of staged drums in warehouse. Note spillage on outside of plastic drum.



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



Another view inside warehouse showing status of drums and other materials present.



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM

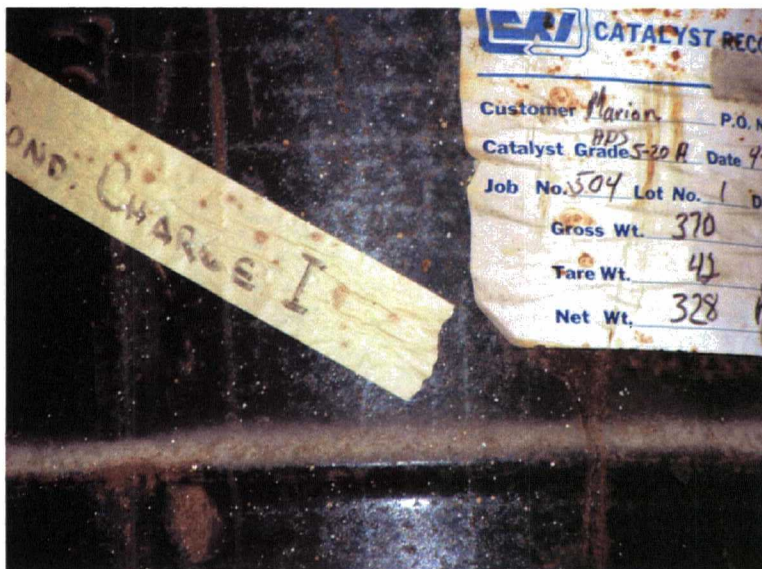


View of drums after US Coast Gulf Strike Team activities.





Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View of drum inside GAMXX warehouse. Note status of labels and staging of drums.



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View of back of warehouse. Note white "sleeves" to go around pipes.



View looking west of primary processing area. Note the metal hanging off the tower.

Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



Another view looking southwest of primary separation area showing status of equipment.



View of asbestos sample area number 16 (arrow; orange paint).



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View of pipettes and other sampling paraphernalia used at the GAMXX facility.



Front wheels of US Coast Guard's 4-wheeler stuck in a drainage ditch inside the tank dike.

Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View looking southwest showing dike structure around Section C of Tank Farm. Tank Number 107 is in view.



View of metal pipe in ground inside the dike. Another pipe lies inside perpendicular to the larger pipe. Exact function unknown, but may have something to do with overflow of storm water inside dike.



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



US Coast Guard Gulf Strike Team dressing for entrance into warehouse to conduct a drum survey prior to drum HazCat procedure. Sample processing location is under blue tent south of the warehouse.



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View of sample processing location under tents. Soil sample GRSS01 and GRSS01D (depth sample) is marked by orange flag (arrow).



View of the relationship between UST monitoring well Number 3 to warehouse on GAMXX. This UST well was sampled for groundwater.



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



Close up of UST groundwater monitoring well Number 3.



US Coast Guard Gulf Strike Team sampling drums in abandoned warehouse on GAMXX. Note they are wearing Level C for this sampling activity.

Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View of sampling activities at GAMXX warehouse. Note Level C clothing being worn. Note decontamination area (plastic) is located outside warehouse (arrow).



Close up view of photograph above showing sampling of one of the drums in the warehouse. Note samplers are clothed in Level C gear.



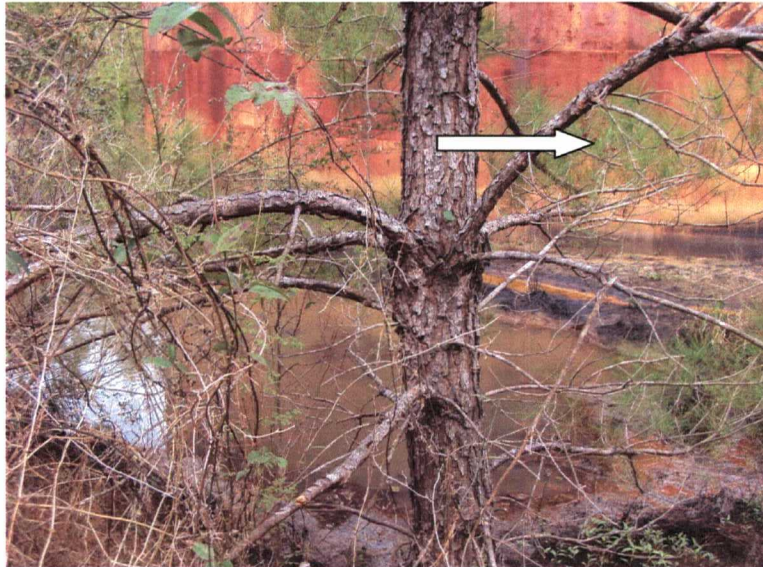
Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



Photograph showing that tank T-202 has been compromised and is leaking onto the ground. The leak is at the south/southeast section of the tank. This tank is in the older tank farm section E. Arrow points north towards primary separation area.



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View of surface water pathway and ponded area adjacent to dike in which the spilled material is leaking. Top photograph is looking to the left/west of tree and bottom photograph is looking to the right/east of tree. Flow is to the right/east.





Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



Photograph was taken from the far left or western end of the ponded area.

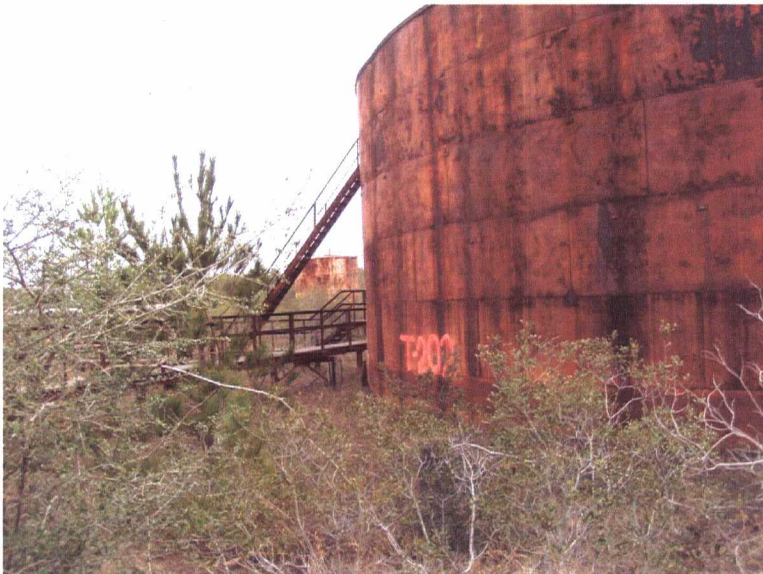


View of T-202 from the opposite side of the tank.

Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View of T-202 as seen from the west. Main part of the facility can be seen in the lower photograph.





Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View of pipelines stretching from the tanks to various parts of the facility.



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



Views of yellow flagged or taped area (white arrows) are areas suspected of having asbestos containing material at their locations. T-202 is the tank below the star.





Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



Inside of furnace (arrow) was shown to have been lined with asbestos. Close up of door and lining can be seen in bottom photograph.



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View of taped off potential asbestos-containing areas and “foot prints” of material left when old tanks had been removed prior to the 2002 Preliminary Assessment.





Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View of taped off potential asbestos-containing areas and “foot prints” of material left when old tanks had been removed prior to the 2002 Preliminary Assessment.



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View looking to the northeast toward warehouse. Two white arrows point out soil sample location GRSS01/GRSS01D under the orange flag and an old gasoline pump with handle outside the warehouse.



View of four old USTs located just north of warehouse that were not noted on PA.



Photographs of GAMXX Oil Refinery During EPA Pre-Removal Assessment  
March 14-17, 2005  
Taken by B. Temple of ADEM



View of small USTs sitting on the ground without any type of secondary containment. It is unknown when these tanks were placed at the location or what may have been in these tanks. The tanks were open (arrow).

# ATTACHMENT

5



## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

POST OFFICE BOX 301463 36130-1463 ♦ 1400 COLISEUM BLVD. 36110-2059

MONTGOMERY, ALABAMA

WWW.ADEM.STATE.AL.US

(334) 271-7700

ONIS "TREY" GLENN, III, P.E.

DIRECTOR

January 16, 2007

BOB RILEY

GOVERNOR

Facsimiles: (334)

Administration: 271-7950  
General Counsel: 394-4332  
Communication: 394-4383  
Air: 279-3044  
Land: 279-3050  
Water: 279-3051  
Groundwater: 270-5631  
Field Operations: 272-8131  
Laboratory: 277-6718  
Mining: 394-4326

To: Dave Davis, Chief  
Assessment Section  
Environmental Services Branch  
Land Division

From: Antwan Parker, ESII, and Bonnie L. Temple, ESII  
Environmental Services Branch  
Land Division

Subject: Trip Report: Former GAMXX Oil Refinery ALD095697058  
Hamilton Blvd, LLC ALRERA #461-9415  
4000 Hamilton Boulevard  
Theodore, Mobile County, Alabama 36582

On January 11, 2007, Antwan Parker, Ken Prestridge, Bonnie Temple and Matt Thomas traveled to Theodore, Alabama to conduct an on-site inspection for the CERCLA Reassessment of the former GAMXX Oil Refinery in Theodore, Alabama. We met government officials Phillip Woods, ADEM Mobile Field Operations and Adam Davis and Dean Ullock, US EPA Mobile, Alabama Post at the Hamilton Blvd gate. On-site were Hamilton Blvd, LLC contacts Chuck Byrum, John Ramsey, and attorney Stephen Harvey. Discussions concerning the history, hazards and cleanup activities were held during the inspection of the site.

The three access gates have been located and lock, and the fence surrounding the facility has been repaired. Mr. Chuck Byrum visually inspects the facility once a day. The old residence located across Hamilton Blvd has been removed and another building is being constructed. According to Mr. Byrum, at an earlier time, local individuals were fishing in the fire water pond and asked to leave. The UST monitoring wells were identified. Digital and regular photographs were collected during site visit. No additional GPS readings were collected.

During the site inspection, the laboratory and storage building were entered. All chemicals have been removed from the laboratory. The chemicals in the storage building have been removed and the floor swept. The floor was not steam cleaned; therefore, residual chemicals may still remain on the floor. Currently heavy equipment is being stored in this building. Documentation of cleanup and disposal was submitted to the Voluntary Cleanup Program (VCP).



Dave Davis  
Trip Report  
January 16, 2007  
Page 2

Friable asbestos and non-asbestos materials have been sampled and removed from the primary processing area, Power Unit and associated piping. Sample analysis and disposal documentation will be submitted to the VCP. The transformers have been drained of PCB fluids, rinsed and staged with the capacitors awaiting removal. The monitoring wells for the earlier UST removal were located.

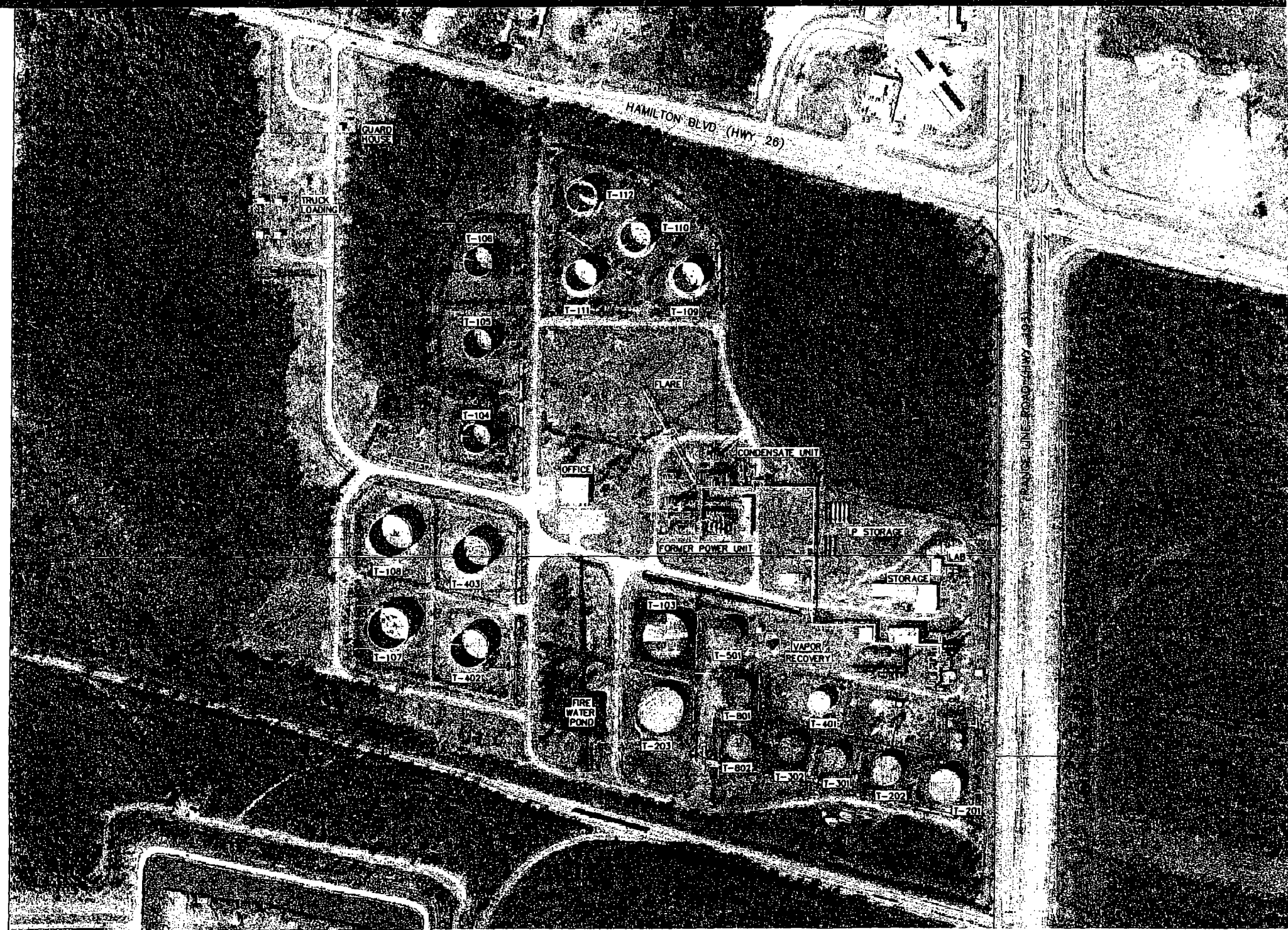
The leak along storage tank T-202 south/southeast section of was viewed and appeared the same and in the site visit of March 14, 2005. Tank T-203 had a large hole cut in the south side and large holes were seen in the floating top. Water containing minnows were in the bottom of the tank. The dike around tank T-203 was holding water.

The drainage ditch between the railroad and the GAMXX has been closed. The main surface water pathway lies to the north and flows into Alligator Bayou and Dog River.

BLT/AP

CC: Mr. Larry Norris, Chief, Redevelopment Unit, ESB  
Attachments: Aerial map view, Trip Notes, Photographs





GAMXX REFINERY  
THEODORE, MOBILE COUNTY, ALABAMA

SITE LAYOUT MAP  
GAMXX REFINERY  
FIGURE 2



DRAWN: J. MILLER	DATE: 12/31/02	W.O. NO: 12587-00
EPA ID NO:		TDD NO: 4W-04-

at 9:11

backhoe tractor #0  
d fill area  
fill with bricks,  
filling material



ENVIRONMENTAL  
PROTECTION AGENCY

Dean A. Ullock

Federal On-Scene Coordinator  
Emergency Response & Removal Branch

Gulf Strike Team  
8501 Tanner Williams Road  
Mobile, AL 36608

Telephone: (251) 441-5913  
Fax: (251) 441-6610  
E-mail: k.dean@epa.gov

Printed with soy ink on 50% recycled 30% postconsumer, ECF paper

1-11-07

John Ramsey

Ken, Matt, Bonnie, & I arrived onsite at 11:00

- onsite was Dean Ullock for EPA Action,

Phil Wood, Chuck Byrum, Steve Harvey

- previous property owner wants to reclaim the land after they spent money to start cleanup because of tax sale
- Castle

- all chemicals are removed from lab

- transformers & capacitors are drained washed & oil has been removed are being held in warehouse

- run property ownership question by Larry & state lawyers,

- asbestos has been sampled & removed & report will be sent in

- crude oil leaking from tank

Castle has filed a suit to reclaim the land & pay back taxes & they don't want to continue putting money in properly & not be able to reclaim money spent

Antwan Parker  
1-11-07

GAMXX - AHI

1/1/06 Stephen Hardy (251) 432-5300 off  
Atty for Hamilton Blooms LLC - phone call  
to set up site visit (1/11/07) with  
Antwan Parker

Stephen Hardy call - after 10:30 251-463-3243

Chuck Byrum call 251-508-2213

1/11/06 at site (1100)

Chuck Byrum

John Ramsey

Adam Davis - EPA

Deed Allocks EPA

Phil Wood

Ken Probst

Matt Thomas

Antwan Parker

removed asbestos samples

minor cleanup \$300-400,000

previous owners may want it back

have a tax deed - tax sale 92 - 05 deed

Bonnie Temple  
7/11/07

1980 nation oil - (1990s)  
GAMXX - 1990 Cas  
Energy bot mortgage - no tax paid  
tax sale 1992 (State bot it)  
(land comm off)  
million 13 - oct 3, 2005 bot

11/8/1 lab - cleared  
view

Transformers - drained - needed &  
removed - still have transfer  
capacitors - 115/

viewed T-202 - looks about same

Survey 1X day - Chuck Byrum

T203

1300 finished assessment trip

www.epaosc.net

GAMXX

Bonnie Temple  
7/11/07

Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



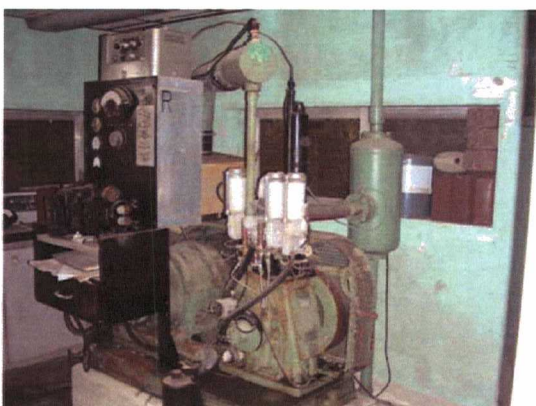
Top photograph shows individuals present on GAMXX site inspection:  
Hamilton Blvd LLC, ADEM and EPA.



Bottom photograph shows the entrance gate to GAMXX. Note hole in fence to the left of guard house has been repaired and electronic gate can only be opened with a code. Hamilton Boulevard lies behind gate and Rangeline Road lies to the left out of view.

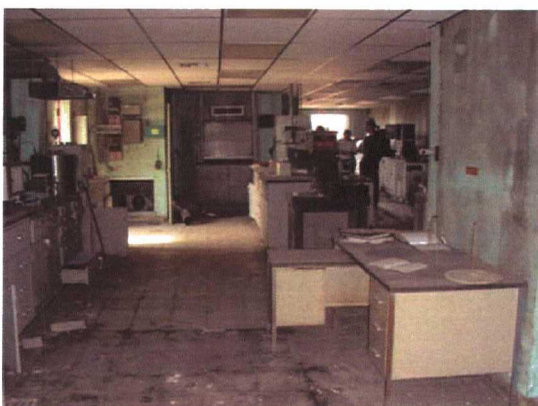


Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Various views inside the Laboratory building documenting removal of miscellaneous containers of chemical left on-site. Hamilton Blvd LLC paid for the removal activities.

Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Various views inside the Laboratory building documenting removal of miscellaneous containers of chemical left on-site. Hamilton Blvd LLC paid for the removal activities.



Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Photograph of GAMXX storage building with the doors open on January 11, 2007 showing that after Hamilton Blvd, LLC had sampled and disposed of drums. The floor was swept but not cleaned.



View of rear portion of storage building showing the clean up activities that Hamilton Blvd, LLC had conducted. Portion to the left has not been cleaned.

Photographs of GAMXX Oil Refinery During Site Visit  
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Taken by K. Prestridge and B. Temple of ADEM



Closer view of the northeast corner of the storage building which has had a partial cleaning. The bottom photograph shows the area still to be addressed.





Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



View of inside of another storage building where capacitors and transformers (white arrow) are being staged prior to disposal.



Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Close up view of capacitors and transformers that are waiting for disposal. PCB-containing oil and non PCB oil have been drained from units and sent for disposal.





Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Top photograph shows ADEM personnel exiting the building where the transformers and capacitors are staged. Bottom photograph is a composited panoramic photograph of the view across from the rear of the storage building. The photograph shows the view of the property from the south through to the west. The white building in the extreme right is the drum storage building.





Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



View of the foundry looking to the south. Bottom photograph is taken from around the corner to the east and looking to the west. Rangeline Road lies behind the photographer in lower photograph.



Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Panoramic photograph of eastern edge of Crude Unit which is located between storage building and Tank T-101. Rangeline Road lies behind photographer. Note that the debris which was made of asbestos and non-asbestos material has been removed from ground. Panoramic was composed of four photographs.



Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Additional photographs showing current status of various equipment and tanks at GAMXX.



Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Upper panoramic photograph shows roadway running east to west (view to west) between storage tanks T-103 and T-603 and the Powerformer Unit. Lower photograph shows the Powerformer Unit with the Condensate Unit behind it. Note: silver and red cylindrical tanks adjacent to Tank T603 (next page).





Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Photograph showing Vapor Recovery Unit and adjacent tanks located east of Tank 603. Diked tanks lie in the background. Tanks and equipment in lower photographs lies to the south of silver tanks. See page above for panoramic photograph.





Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Upper photograph shows Tanks T901 and T902 between older storage tank area and Crude Unit. Rangeline Road lies in the background/east. The railroad tracks lie along upper right/south out of photograph. The storage tank footprint can be seen above arrow. Lower photograph shows roadway running east to west (view to west) between storage tanks T-103 and T-603 and the Powerformer Unit. Storage Tank T-202 lies to the south of footprint.

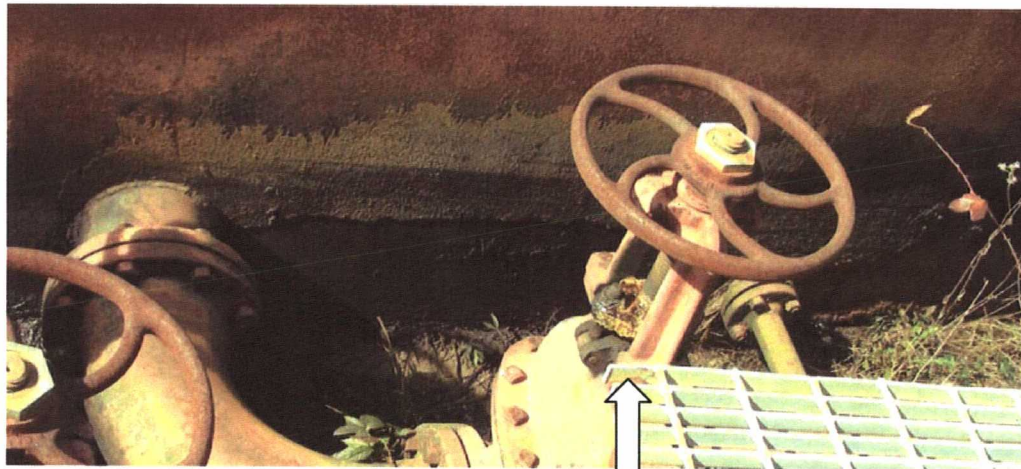




Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
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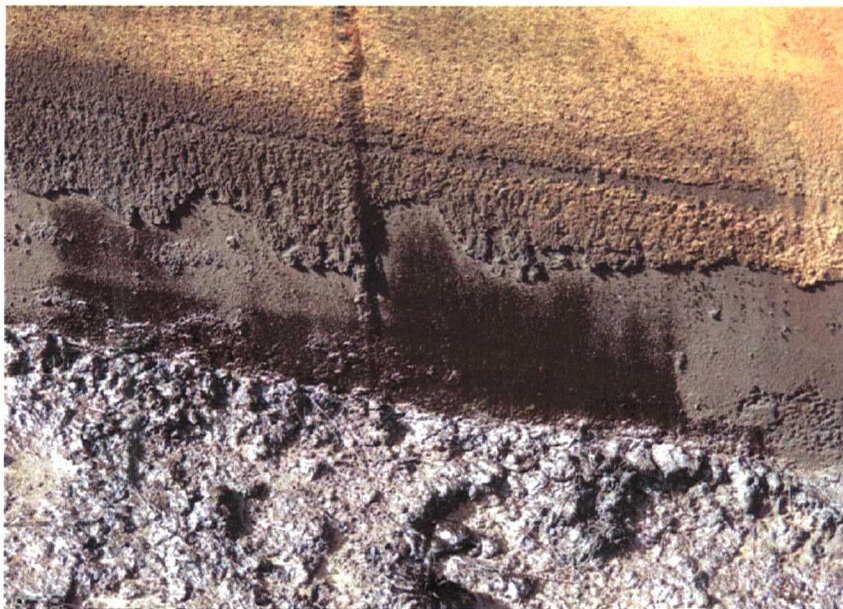
View of the east side of Tank T-202 showing compromised tank integrity and continued leakage from tank. Bottom photograph shows the corrosion of the valve (white arrow).



Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



In the upper photograph the rainwater flow out of diked area is south into a ditch at the back tree line. It would then flow to the left (white arrow) out into a drainage ditch. The lower photograph shows a closer view of spill and integrity of T-202.





Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Upper photograph is a composited panoramic view of older portion of GAMXX as seen from T-202 walkway. Crude unit and Rangeline Road lies to the right/northeast. Powerformer and Condensate Units lied in the center background/north. Tanks T-103, T-203 and T-603 and railroad tracks lie in left/south. Lower photograph is a composited panoramic photograph of the Powerformer Unit.



Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



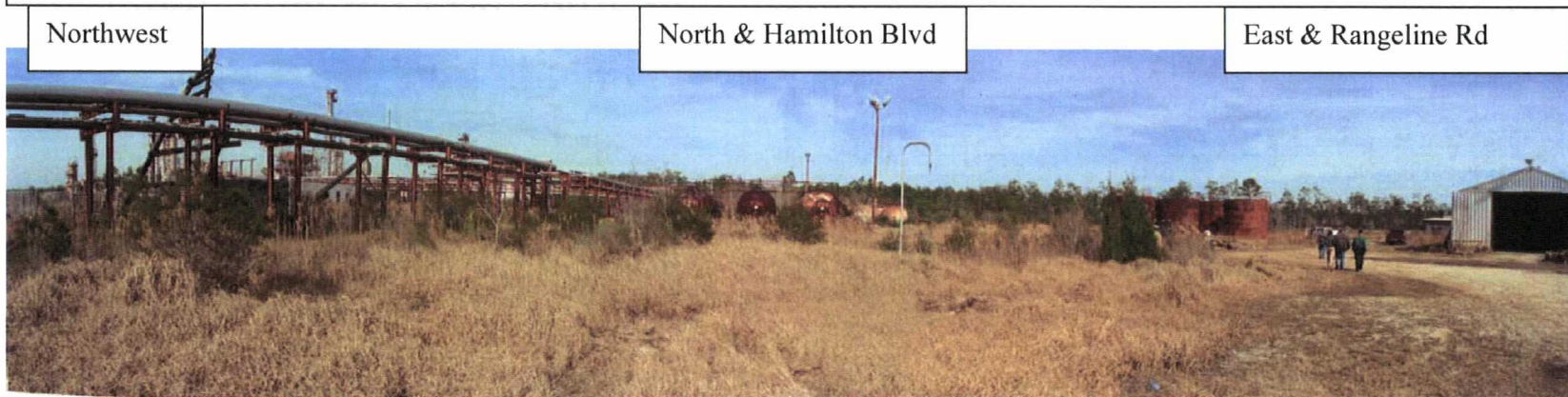
Beginning of panoramic view from inside GAMXX showing the facility structure from the center of manufacturing process. Drum storage building to the left/north out of photograph. Pipeline continued on next page. Crude Unit and Rangeline Road lies behind buildings in the background.



Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Continued panoramic view from inside GAMXX composed of seven photographs showing GAMXX from the center of the manufacturing process. Powerformer and Condensate Units lies behind pipeline in the northwest. Drum storage building lies in lower photograph at extreme right/east. Propane tanks lie in background/north while empty AST's lie between propane tanks and drum storage building.





Photographs of GAMXX Oil Refinery During Site Visit  
January 11, 2007  
Taken by K. Prestridge and B. Temple of ADEM



Composited panoramic photographs showing location of waste water treatment (white arrow) between two sets of storage tanks with dikes. Tank T-203 has large entrance hole cut in it. Lower panoramic photograph shows lack of integrity of T-203.



# ATTACHMENT

5

## **Chronology for GAMXX-AAI Energy Inc and Seabury Station**

Theodore, Mobile County, Alabama  
EPA ID No. ALD095697058  
CERCLA Ref. No. 6691

Kushla, Mobile County, Alabama  
EPA ID No. AL0002368827  
CERCLA Ref. No. 6798

December 14, 1963	Construction in progress as Alabama Refining Company, Inc.
Date: 1976 To 1983	Second company operated as Marion Corporation (Marion Refining Co., Marion Corp.—Refining Operations).
October 17, 1973	An additional 90 acres was added to original acreage.
April 1976	Its tank farm (Seabury Station) was started in Kushla, AL.
Date: 1983	Marion facility shut down indefinitely and declared Chapter 11 Bankruptcy by 1983.
May 16, 1985	GAMXX Energy, Inc. entered into a lease/purchase agreement for the site.
Date 1987	Alexander Allen, Inc. bought GAMXX Energy, Inc in 1987. Name changed to AAI-GAMXX but permits still under GAMXX Energy, Inc.
June 1987	The refinery was started up again and possibly only operated for less than 24 hours.
January 21, 1988	GAMXX notebook (see photograph) states “ <u>**SHUT DOWN UNIT...1/21/88...PUT UNIT INTO MOTHBALLS</u> (Will the last person here please turn out the lights). Don...A. M. F. Robert.”
September 1, 1989	During an ADEM site visit, plant personnel stated that petroleum material leaches from the soils inside the dikes during heavy rain.
Date 1990	One 8,000 gal unleaded regular gasoline UST was removed from GAMXX. Analysis indicated that soil contamination did occur (ADEM UST Program). Wells drilled and groundwater monitored.
Date 1994	Jerry Cheatwood and Jeremy Stamps conducted a site visit and collected photographs.
February 18, 1994	Fax letter to Will Bacon states “the process units were last used in December 1990 to give a three-day demonstration...for the Department of Defense.”
April 1, 1996 through May 16, 1997	Bonnie Temple communicated with Alexander Allen, Inc.,
February 12, 1997	Bonnie Temple conducted the first site visit to GAMXX
March 1, 1997	Emergency Response Incident Report (ERIS #2151) concerning spill at Seabury Station in Kushla, AL.
April 17-18, 1997	Bonnie Temple conducted the second site visit to GAMXX (photographs taken).
May 14, 1997	Bonnie Temple contacted Scott Borwn (ADEM Mobile FO) for information on Seabury Station tank farm and learned of emergency response.
May 22, 1997	Bonnie Temple finished GAMXX Preliminary Assessment and submitted it to EPA Region 4.
May 28, 1997	Site Discovery for Seabury Station in Kushla submitted to EPA.

### **Chronology for GAMXX-AAI Energy Inc and Seabury Station**

Theodore, Mobile County, Alabama

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CERCLA Ref. No. 6691

Kushla, Mobile County, Alabama

EPA ID No. AL0002368827

CERCLA Ref. No. 6798

June 1, 1997	Site Discovery for GAMXX was received at EPA.
July 14-15, 1997	Bonnie Temple conducted an inspection of Seabury Station Tank Farm after the ERIS #2151 complaint.
December 23, 1997	Bonnie Temple finished Seabury Station PA and submitted it to EPA.
April 22, 1998	Meeting with Alexander Allen and consultant with ADEM (Air, RCRA, Water, Site Assessment Unit) requesting reopening GAMXX.
May 28, 1998	Phillip Skaggs, Jerremy Stamps and Chris Smith conducted a site inspection of GAMXX for its CERCLA Site Inspection. Twenty-four samples collected.
December 12, 1998	Letter from Myrt Jones (The Mobile Bay Audubon Society) to Ron Gore (ADEM Air Division) and Carol Bronner (EPA) concerning the possible reopening of the old Marion Refinery listing concerns at the site.
April 28, 1999	EPA Received the CERCLA Site Inspection for GAMXX written by Phillip Skaggs, ADEM Montgomery Field Operations.
June 16, 2004	Representatives of EPA and ADEM conducted a joint site inspection of GAMXX facility.
June 18, 2004	Bonnie Temple communicates with Phil Woods (ADEM Mobile FO) concerning latest activity at GAMXX.
June 30, 2004	Letter to Shane Hickcock (EPA ERRB) from Gerald Hardy, summarizing latest activities and requesting ERRB assistance.
December 1-3, 2004	Dean Ullock e-mailed Dave Davis setting up December site visit to GAMXX and Seabury Station.
December 2, 2004	Bonnie Temple submitted comments on the review of GAMXX SSSP to Dean Ullock, EPA OSC.
December 7-8, 2004	Dave Davis and Bonnie Temple met Dean Ullock and Weston Solutions to inspect GAMXX and Seabury Station (photographs taken).
January 19, 2005	Weston Solutions submitted the revised Sampling Plan for GAMXX refinery dated January 12, 2005.
January 24, 2005	Dave Davis and Bonnie Temple met with Matt Taylor and Shane Hichcock (EPA ERRB).
January 25, 2005	Dave Davis and Bonnie Temple met with Dean Ullock, Terry Stillman, Ralph Howard of EPA and Weston Solutions, Inc. (EPA contractors) to discuss sampling activities at GAMXX.
February 14, 2005	Dean Ullock notified ADEM that ACM conducted limited sampling for asbestos at GAMXX on February 8, 2005.
February 15, 2005	Lynn Garthright sent the website showing for sale of GAMXX facility and update of information from Air Division.



## **Chronology for GAMXX-AAI Energy Inc and Seabury Station**

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Kushla, Mobile County, Alabama  
EPA ID No. AL0002368827  
CERCLA Ref. No. 6798

February 26, 2005	Mobile Register prints an article "Abandoned oil tanks pose safety hazard in Kushla."
February 28, 2005	After the article, e-mail from Clint Niemeyer (ADEM Public Relations) notifying ADEM that he had received a call from Prudential-Cooper Commercial Real Estate in Mobile, Al in the interest of the mortgage lien holder concerning GAMXX and Seabury Station.
March 7, 2005	Dean Ullock e-mailed rough outline of activities for the upcoming sampling activities by EPA/USCG (ADEM onsite).
March 10, 2005	News Release from EPA notifying the public of the upcoming joint EPA and ADEM site sampling of GAMXX and Seabury Station.
March 13-17, 2005	EPA, ADEM, Weston Solutions, and USCG Strike Team joint inspection and sampling of GAMXX and Seabury Station.
April 8, 2005	Letter to Mr. Martin Smith of Weston Solutions sending CD of photographs from March 14-17, 2005.
July 18, 2005	Letter to Terry Stilman (EPA) from Bonnie Temple with comments to the Removal Assessment Report.
July 21, 2005	CD mailed to Weston Solutions containing GAMXX PA and SI plus Seabury Station PA.
August 5, 2005	Weston Solutions submitted Removal Assessment Report, Revision 2 to Terry Stilman. Received in ADEM August 8, 2005.
September 6, 2005	Terry Stilman (EPA) sent the Action Memorandum for GAMXX Refining Site to Gerald Hardy.
November 3, 2005	Letter to McDowell Knight Roedder & Sledge, LLC from Bonnie Sawyer (EPA) Hamilton Blvd LLC concerning sampling results and intended disposal of materials from GAMXX.
November 2, 2005	Phone call and fax from Jim McGuire sending McDowell Knight Roedder & Sledge, LLC's letter and analysis on drum samples to Bonnie Sawyer (EPA).
November 4, 2005	Email from Jim McGuire to Bonnie Temple sending the Nov. 3, 2005 EPA letter.
November 7, 2005	Letter to McDowell Knight Roedder & Sledge, LLC from Dave Davis (ADEM) urging Hamilton Blvd LLC concerning cleanup activities for GAMXX in Theodore, AL.
November 30, 2005	Phil Davis refers email from Dean Ullock to Dave Davis/ Bonnie Temple.
December 29, 2005	Email from Phil Wood (ADEM Mobile FO) after inspection of activities on Nov. 3, 2005. Wendall Spencer (ETT) requests communication with ADEM.
January 3, 2006	Larry Norris called Mr. Spencer concerning their activities and the ALRERA Program.
February 1, 2006	Meeting between Wendall Spencer (ETT) and ADEM concerning GAMXX in Theodore, Al.

## Chronology for GAMXX-AAI Energy Inc and Seabury Station

Theodore, Mobile County, Alabama  
EPA ID No. ALD095697058  
CERCLA Ref. No. 6691

Kushla, Mobile County, Alabama  
EPA ID No. AL0002368827  
CERCLA Ref. No. 6798

February 1, 2006	Meeting between Wendall Spencer (ETT) and ADEM concerning GAMXX in Theodore, AL.
April 18, 2006	Application for VCP admittance for Gamxx Refinery Site in Theodore, AL, report body of the Weston Removal Report (June 20, 2005), maps and fee of \$2,000. <b>Ownership: 90-Acre Parcel acquired by Hamilton Blvd, LLC from State of Alabama in October of 2005; 30-Acre Parcel acquired by Hamilton Blvd, LLC from State of Alabama in April of 2006.</b>
June 20, 2006	Letter from Stephen Harvey (McDowell, Knight Roedder & Sledge. LLC) to Pam Wilson (ADEM VCP) sending the report body of the Weston Removal Report (June 20, 2005), their cleanup plan and \$4,655.00 for review fee.
December 5, 2006	Letter from S. Harvey to Antwan Parker enclosing reports, contractor disposal manifests and other documentation from ACT Lab showing the cleanup activities that had been performed concerning the 6/20/06 Remedial Action Plan submitted by Hamilton Blvd LLC and ACT.
December 11, 2006	Request for Hydrological Services from ADEM Water Division by Antwan Parker.
January 9, 2007	Telephone conversation concerning trip confirmation from B. Temple to S. Harvey (meet at 11 am at front gate of GAMXX on January 11, 2007).